

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DEBBIE ALMONTASER,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION;
JOEL KLEIN, individually and in his official capacity as
Chancellor of the New York City Department of
Education; ROSEMARY STUART, individually and in her
official capacity as Community Superintendent of District
15 and Hiring Manager; CITY OF NEW YORK;
MICHAEL BLOOMBERG, individually and in his official
capacity as Mayor of the City of New York; DENNIS
WALCOTT, individually and in his official capacity as
Deputy Mayor for Education and Community
Development,

Defendants.

----- X

**FRANGIOSE
DECLARATION IN
OPPOSITION TO
PLAINTIFF'S
MOTION FOR A
PRELIMINARY
INJUNCTION**

CV-07-10444 (SHS)(FM)

MARIO G. FRANGIOSE, declares under penalty of perjury that the following
is true and correct:

1. I am an Assistant Corporation Counsel in the office of Michael A. Cardozo,
Corporation Counsel of the City of New York, attorney for defendants herein.

2. I submit this declaration in opposition to plaintiff's motion for a preliminary
injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure.

3. Annexed hereto is a copy of the transcription of the November 27, 2007,
deposition testimony of the plaintiff in this action, with attached deposition Exhibits "C" through
"J," which is relied upon and cited in Defendants' Memorandum of Law in Opposition to
Plaintiff's Motion for a Preliminary Injunction, dated November 29, 2007.

Executed: New York, New York
November 29, 2007

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendants
100 Church Street, Room 2-149
New York, New York 10007
(212) 788-1184

By: /s/
Mario G. Frangiose (MF-7806)

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 DEBBIE ALMONTASER,

5 PLAINTIFF,

6 -against-

Case No:
CV 07-10444

7 NEW YORK CITY DEPARTMENT OF EDUCATION; JOEL KLEIN,
8 individually and in his official capacity as Chancellor of
9 the New York City Department of Education; ROSEMARY STUART,
10 individually and in her official capacity as Community
11 Superintendent of District 15 and Hiring Manager; CITY OF NEW
12 YORK; MICHAEL BLOOMBERG, individually and in his official
13 capacity as Mayor of the City of New York; DENNIS WALCOTT,
14 individually and in his official capacity as Deputy Mayor for
15 Education and Community Development,

16 DEFENDANT.
17 -----X

18 DATE: November 27, 2007

19 TIME: 10:52 a.m.

20 EXAMINATION BEFORE TRIAL of the Plaintiff,
21 DEBBIE ALMONTASER, taken by the Defendants, pursuant to a
22 Notice and to the Federal Rules of Civil Procedure, held at
23 the offices of Special Federal Litigation, New York City Law
24 Department, 100 Church Street, New York, New York 10007-2601
25 before a Notary Public of the State of New York.

1 A P P E A R A N C E S:

2

3 ALAN LEVINE, ESQ.

4 Attorney for the Plaintiff
5 99 Hudson Street
6 New York, New York 10013
7 BY: ALAN LEVINE, ESQ,

6

7

8 MICHAEL A. CARDOZO, ESQ.

9 CORPORATION COUNSEL

10 NEW YORK CITY LAW DEPARTMENT

11 Attorney for the Defendant
12 100 Church Street

13 New York, New York 10007

14 BY: PAUL MARKS, ESQ.

15 File #: 07LE038024

16 Control #: BBB00447

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13

14 ALSO PRESENT:

15 Robin Greenfield, Esq.

16 Mario Frangiose, Esq.

17 James Lemonedes, Esq.

18 Cynthia Rollings, Esq.

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D. ALMONTASER

1 D E B B I E A L M O N T A S E R, called as a witness,
2 having been first duly sworn by a Notary Public of the State
3 of New York, was examined and testified as follows:

4 BY THE REPORTER:

5 Q. Would you please state your name for the record?

6 A. Debbie Almontaser.

7 Q. Would you please state your address for the record?

8 A. 719 Westminster Road, Brooklyn, New York 11230.

9 MR. MARKS: Could you mark these, please?

10 (Whereupon, the aforementioned Declaration was
11 marked as Defendants' Exhibit A for identification
12 as of this date by the Reporter.)

13 (Whereupon, the aforementioned Complaint was
14 marked as Defendants' Exhibit B for identification
15 as of this date by the Reporter.)

16 EXAMINATION BY

17 MR. MARKS:

18 Q. Good morning, Ms. Almontaser.

19 A. Good morning.

20 Q. As you know already, my name is Paul Marks. I'm
21 Assistant Corporation Counsel for the New York City Law
22 Department and along with my colleague, Mario Frangiose.

23 I represent the Defendants in this action you've
24 brought against the New York City Department of Education,
25 Chancellor Joel Klein, Rosemary Stuart, who is the

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1 Superintendent of Community School District 15, Mayor
2 Bloomberg and Deputy Mayor Dennis Walcott.

3 Also present today are Robin Greenfield from the
4 Department of Education counsel's office, and James
5 Lemonedes, another attorney in my office.

6 I'm going to be asking you some questions about
7 your allegations and claims in this action, and I know
8 Mr. Levine and I had an off-the-record discussion about this,
9 but I want to just state for the record that the outset of
10 this deposition is going to focus on some of the issues that
11 are raised by your motion for a preliminary injunction for
12 which Judge Stein has directed some expedited discovery, and
13 that Defendants views at this deposition is not and should
14 not be considered as Defendants only opportunity to depose
15 you in this case.

16 As this action proceeds, Defendants will seek,
17 again, to take your deposition again to address all of your
18 allegations and claims, those that weren't covered in this
19 deposition, including your claims for damages in this action
20 which we are not going to ask you any questions about today.

21 So it's important you understand the questions I
22 ask and give accurate answers. If I ask a question that you
23 don't understand, please let me know, and I'll try to
24 rephrase it, otherwise I'll assume that you understood the
25 question.

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1 Also, please give verbal answers to the questions
2 so they can be recorded by the Court Reporter. And if you
3 wish to take a break at any time, please let us know, I only
4 ask that you not take a break while a question is pending to
5 you.

6 Is there any reason that you will not be able to
7 answer the questions today accurately?

8 A. No, there is no reason for me not to answer
9 anything accurately.

10 Q. Did you review any documents in preparation for
11 your deposition today?

12 A. No.

13 Q. Other than your attorneys, have you spoken with
14 anyone about your deposition today?

15 A. No.

16 MR. LEVINE: And other than her husband, you
17 don't want to know about that either?

18 MR. MARKS: Right. I assume that's protected
19 by the -- anyway.

20 BY MR. MARKS:

21 Q. I'm going to ask you some brief background
22 questions.

23 Could you describe your educational background from
24 college onward?

25 A. I graduated from St. Francis College in Downtown

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1 Brooklyn with a B.A. Afterwards, I pursued a Master's from
2 Adelphi University in Reading. And then afterwards, I was at
3 Baruch College for an administrative degree. And I also went
4 to Brooklyn College to get my Special Education
5 certification.

6 Q. What is your B.A. in from St. Francis?

7 A. It's in English and World Religion as a minor.

8 Q. What degrees, if any, do you have from the other
9 schools that you attended?

10 A. So I have a Bachelor's from St. Francis. From
11 Adelphi I have a Master's. From Baruch I have, also, the
12 administrative certification.

13 Q. The Master's from Adelphi is in Reading?

14 A. Yes, Reading Specialist K to 12.

15 Q. The certification you have from Baruch is?

16 A. Administrative, it was a part of the Aspiring
17 Leadership Program through the Department of Education in
18 District 15.

19 Q. Does that administrative certification, is that for
20 a particular level in the New York City public schools,
21 School Administrator?

22 A. Yes, to be a School Administrator.

23 Q. Is it for a School Administrator of a particular,
24 for example, is it for just kindergarten, is it for
25 kindergarten through another grade, is it middle school?

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1 A. Right, because I believe that both of my
2 certifications in Reading and Special Education are K to 12,
3 my administrative allows me to work within those grade
4 levels.

5 Q. K to 12?

6 A. Yes. Upon applying for the position, I did get a
7 notice that said I didn't have the middle school license and
8 I went on the Department of Education website and applied for
9 it and received it.

10 Q. And the license is from the New York State
11 Department of Education or the New York City Department of
12 Education?

13 A. My certification is from the New York State and
14 then my licenses are from the New York City Department, it's
15 the C of O or C of E, I can't remember what.

16 Q. Are you currently employed?

17 A. Yes.

18 Q. Where are you employed?

19 A. I am employed at the Department of Education at 52
20 Chambers.

21 Q. What is your current position at the New York City
22 Department of Education?

23 A. I work at the Office of School and Youth
24 Development under Elaine Constantine, and my title is
25 Director of Policy and Planning of Special Projects.

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1 Q. What are your duties in your current position?

2 A. I have been focusing with the Deputy Director,
3 Anthony Orzo, on working with the persistently dangerous
4 school and the impact schools as well as I'm working with the
5 alternative learning centers which are the suspension sites
6 making sure that they have speech providers and any other
7 things that they may need.

8 Q. How long have you held the position that you're
9 currently in?

10 A. I've been there since mid-August.

11 Q. That's mid-August 2007?

12 A. Yes.

13 Q. What is your annual salary?

14 A. I believe it's 120,000.

15 Q. When did you begin working for the New York City
16 Department of Education?

17 A. I began in 19 -- I believe 1991.

18 Q. Could you just briefly list the positions you've
19 held with the Department of Education since 1991?

20 A. I began as a paraprofessional at P.S. 321, I did
21 that for a few years. I became a Special Education teacher
22 at P.S. 321. I left them and became a teacher, a Special
23 Education teacher at P.S. 29 for a couple of years. And then
24 following that, I went to P.S. 94 as a Literacy Staff
25 Developer or Coach for three-and-a-half years, followed by

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1 going back into the classroom and teaching Special Education
2 at P.S. 261. I did that for a semester and I was pulled out
3 of the classroom by the Community Superintendent, Carmine
4 Farina of 15, who made me the Cultural Diversity Coordinator,
5 was actually working on an elementary, as well as middle and
6 high schools, doing cultural sensitivity and conflict
7 resolution work after September 11th.

8 I did that, and then the restructuring happened and
9 then I continued to do the same work but under a different
10 title which was Coordinator of External Programs for a year.

11 I was accepted into the Revson Fellowship at
12 Columbia and I took a leave of absence for six months, came
13 back, continued on the Coordinator of External Programs and
14 then rather than doing the cultural diversity or conflict
15 resolution work with schools, I took on the responsibility of
16 working with community-based organizations and after school
17 programs and managing grants and programs and in the schools
18 of Region 8. Did that.

19 Then there was another restructuring and after that
20 restructuring I became a Youth Development Specialist which
21 began, the restructuring was actually this past year, 2006.
22 And I was the Youth Development Specialist up until February
23 after KGIA, the Khalil Gibran International Academy was
24 approved, where I was still on salary with the DOE and in the
25 same position.

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1 However, with New Visions and the Office of New
2 Schools, the grant from New Visions paid my salary from
3 February to June 30th to allow me to do an internship at
4 Thurgood Marshall Leadership Academy in Harlem. And then, at
5 the same time, I was also resuming the responsibilities of
6 preparing the opening of the Khalil Gibran.

7 Q. And you became Interim-Acting Principal at, I'll
8 refer to it as K-G-I-A, so you became Interim-Acting
9 Principal at KGIA on July 1, 2007?

10 A. Yes.

11 Q. I just want to show you what's been marked, I'll
12 give you both Defendants' Exhibit A, which is a copy of your
13 Declaration that you submitted in support of the preliminary
14 injunction motions and a copy of the Complaint in this action
15 with all the Exhibits annexed to it.

16 MR. LEVINE: These are called Defendants' A
17 and B?

18 MR. MARKS: Defendants' A and B.

19 Defendants' A is the Declaration of
20 Ms. Almontaser, dated November 18, 2007, and
21 Defendants' B is the Complaint in this case with
22 the attached Exhibits.

23 (Witness perusing the document.)

24 BY MR. MARKS:

25 Q. If you can just look at your Declaration first and

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1 if you want to take time to review it in response to the
2 question I'm about to ask, please take your time.

3 I just want you to review it and I just want --
4 that is your signature on the last page of the Declaration?

5 (Witness perusing the document.)

6 A. Yes, correct.

7 Q. Did you review the Declaration before you signed
8 it?

9 A. Yes.

10 Q. If you need time to look at it, I just want to know
11 is everything accurate in the Declaration to your
12 understanding?

13 MR. LEVINE: Could we just start off presuming
14 that and if you have particular questions or I
15 mean, if you want her to read the whole thing, I
16 mean, I'll stipulate that at the time she thought
17 it was accurate and if you want a fresh read now,
18 she will.

19 MR. MARKS: We'll go through it. We don't
20 need to go through, you know.

21 BY MR. MARKS:

22 Q. You also have in front of you Defendants' Exhibit
23 B, which is a copy of the Complaint in this action, the
24 Exhibits annexed to it, and I just want to know: Did you
25 read the Complaint before it was filed with the court?

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1 A. Yes.

2 Q. Just going back to your Declaration on paragraph
3 two where you refer to being asked by New Visions for Public
4 Schools to participate in the development of KGIA, what is
5 New Visions?

6 A. New Visions for Public Schools is a nonprofit
7 organization that receives funding from the Gates Foundation
8 to develop new schools, small new schools.

9 Q. When did New Visions ask you to participate in the
10 development of KGIA?

11 A. They asked me in 2005.

12 Q. Was it someone in particular at New Visions who
13 asked you or people in particular that asked you to
14 participate in development of --

15 A. I'm sorry, it was 2006.

16 Q. Did someone in particular at New Visions ask you to
17 participate in the development of KGIA?

18 A. Yes, I was approached by Adam Rubin, who works at
19 New Visions.

20 Q. What position did you hold with the DOE at the time
21 that Mr. Rubin of New Visions asked you to participate in the
22 development of KGIA?

23 A. I was Coordinator of External Programs.

24 Q. That was for District 15?

25 A. Yes.

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1 Q. If you go to paragraph four --

2 A. I'm sorry, it's 2005, I'm getting my years
3 confused.

4 Q. Paragraph four of the Declaration on the second
5 page, you state that on February 12, 2007, the New York City
6 Department of Education announced the establishment of KGIA
7 and you were named Project Director; and, who named you to be
8 the Project Director of KGIA?

9 A. The Office of New Schools.

10 Q. Did someone in particular at the Office of New
11 Schools name you Project Director for KGIA?

12 A. The person that I was dealing with at that point
13 was Joshua Thomases and Julian Cohen.

14 Q. At that time in February 12, 2007, was there a date
15 that KGIA was supposed to open as a functioning school?

16 A. It was supposed to open September 4, 2007 as a
17 functioning school. It received approval February 12th
18 public -- it was announced publicly February 12th.

19 Q. When you were named Project Director, did your
20 salary change?

21 A. No.

22 Q. So what was your salary at the time you became
23 Project Director?

24 A. My salary remained the same as when I was the Youth
25 Development Specialist.

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1 Q. And what was your salary as Youth Development
2 Specialist?

3 A. I don't recall off the top of my head. I think it
4 was somewhere in the mid-70s, but I'm not sure.

5 Q. What were your duties as Project Director for KGIA?

6 A. My duties were to start the development and
7 creation of the school to make it a reality and so as Project
8 Director I was attending the new intensive sessions on a
9 weekly basis.

10 I was also attending the New Visions lab meetings
11 that were taking place on a weekly basis, and at these
12 meetings they were walking us through the process of what
13 needed to get done by what time.

14 And so it was really, you know, reviewing and
15 understanding budgets, understanding how to hire staff,
16 ordering materials, books, curriculum developing,
17 professional and development plans, developing curriculum,
18 also student recruitment, doing middle school fairs and many,
19 you know, the list could go on.

20 Q. KGIA was -- it was projected as a -- what sort of
21 school it was going to be, what grades was it going to?

22 A. Sixth through 12.

23 Q. For the September 2007 opening, was it just going
24 to be a sixth-grade class?

25 A. Correct.

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1 Q. Then more grades would be added in the years
2 thereafter?

3 A. Yes.

4 Q. As Project Director, what role, if any, did you
5 have in the selection of the site for KGIA?

6 A. I didn't have any role in terms -- the only thing
7 was that the Office of New Schools share the possibilities
8 with me of where they were thinking to site the school.

9 Q. I just want to direct your attention to March 12,
10 2007.

11 Were you at a meeting concerning KGIA that took
12 place at P.S. 282?

13 A. 282, yes.

14 Q. Who attended the meeting?

15 A. Well, there were two meetings. There was one with
16 the staff of the elementary school, and then one with the
17 families that was held later in the evening.

18 Q. What was the subject of the meetings, the meeting
19 with the families at P.S. 282 that evening?

20 A. The subject was to share with them the sharing of
21 the space at the school. However, it didn't end up turning
22 that way because they were very hostile and did not want to
23 have any school, any middle school at their site.

24 Q. P.S. 282 is located where?

25 A. It's in Park Slope.

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1 Q. Did you speak at the meeting with the parents, the
2 families?

3 A. At the end of the meeting there were a couple of
4 parents that had just one-on-one conversations with me.

5 Q. Did you speak to the parents as a group during the
6 meeting?

7 A. Yes. Yes, they wanted to learn more about the
8 school and I gave them the mission and vision of the school.

9 Q. May 14, 2007, you were at a meeting concerning KGIA
10 at the Brooklyn High School of the Arts and the Math and
11 Science Exploratory School?

12 A. Yes.

13 Q. That location is 345 Dean Street in Brooklyn?

14 A. Correct.

15 Q. That's where KGIA eventually was sited?

16 A. Yes.

17 Q. What was the subject of the May 14, 2007 meeting at
18 345 Dean Street?

19 A. The subject was basically to also introduce the
20 school, it's mission and vision and helping the parents
21 better understand what it is based on, what the preconceived
22 notions that they were getting prior from the P.S. 282
23 situation as well as other things.

24 Q. Did you speak to the parents as a group at the
25 meeting?

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1 A. Yes.

2 Q. What did you say to them?

3 A. The mission and vision of the school, what it sets
4 out to do and how important it is to have such a school in
5 New York City, in this country. And I shared an e-mail that
6 I had received from a soldier who served in Iraq.

7 Q. Did you read out loud to those attending the
8 meeting, the e-mail you received from the soldier?

9 A. Yes, I did.

10 Q. Was that soldier's name Sergeant Patrick Kowalchuk
11 K-O-W-A-L-C-H-U-K?

12 A. I believe so.

13 Q. If I can direct your attention to paragraph seven
14 of your Declaration?

15 A. Yes.

16 Q. In which you refer to a telephone interview on
17 August 5, 2007 by a Reporter from the *New York Post*?

18 A. Yes.

19 Q. Was the August 5, 2007 interview of you by the *Post*
20 Reporter the first time you had been interviewed by a member
21 of the news media about KGIA?

22 A. By the news media?

23 Q. Yes.

24 A. No, it was not.

25 Q. If you know, on how many occasions before August 5,

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1 2007 had you been interviewed by the news media on KGIA?

2 A. I would say maybe a couple of times, two, three
3 times.

4 MR. MARKS: Could you mark this, please?

5 (Whereupon, the aforementioned *New York Times*
6 article, dated 2/13/07, was marked as Defendants'
7 Exhibit C for identification as of this date by the
8 Reporter.)

9 BY MR. MARKS:

10 Q. I'm showing you what has been marked as Defendants'
11 Exhibit C, which is a copy of an article from *The New York*
12 *Times*, dated February 13, 2007, by Elissa Gootman, entitled,
13 "*A New School Plans to Teach Half of Class As Using Arabic.*"?

14 (Witness perusing the document.)

15 BY MR. MARKS:

16 Q. I've shown you what has been marked as Exhibit C,
17 which is a February 13th article that I've just described.

18 In February -- well, when you have a chance, have
19 you had a chance to look at it?

20 (Witness perusing the document.)

21 A. Yes.

22 MR. LEVINE: While she's doing this, the
23 transcript, you're not providing us with a copy. I
24 should order my own copy, yes?

25 MR. MARKS: Well, if you request that they

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1 provide it with --

2 MR. LEVINE: Well, I want it promptly like you
3 do. I'd like my own copy. Of course, we'll pay
4 you for it.

5 BY MR. MARKS:

6 Q. So in February 2007, were you interviewed by a
7 Reporter from *The New York Times* by the name of Elissa
8 Gootman?

9 A. Yes.

10 Q. The article that is Defendants' Exhibit C contains
11 some quotations from you; is that correct?

12 A. Yes.

13 Q. And did you, in fact, make the statements that are
14 quoted in the article?

15 A. Yes.

16 Q. How did it come about that you ended up speaking
17 with Ms. Gootman from *The Times*?

18 A. She contacted me directly. I don't know how she
19 received my phone number. And I referred her to the Press
20 Office at the Department of Education. And at that point I
21 told her I would not speak to her unless I had approval from
22 the DOE to speak. And then Melody Meyer contacted me and
23 said to feel free to speak about the school.

24 Q. When you spoke with Ms. Gootman, was that in person
25 or on the telephone?

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1 A. On the telephone.

2 Q. Was anyone else on the telephone line with you when
3 you spoke with Ms. Gootman?

4 A. No.

5 Q. In March 2007, were you interviewed by a Reporter
6 by the name of Sarah, S-A-R-A-H, Garland, G-A-R-L-E-N-D, of
7 the paper *The New York Sun*?

8 A. Yes.

9 Q. How did the interview with Ms. Garland from *The Sun*
10 come about?

11 A. The interview came about by Ms. Garland contacting
12 the Press Office and insisting that she do a profile on me.
13 And the Press Office contacted me, and I was very
14 apprehensive because I did not like *The New York Sun* and I
15 didn't think that they would give a fair shake or, you know,
16 represent me or the school in a way that would be factual.
17 And so I was apprehensive about it.

18 And at that time there were also articles in *The*
19 *New York Sun*, I believe they began somewhere around then,
20 either before, I'm not sure if it was -- yes, I think it was
21 before where there was an article in there and she wanted to
22 do a profile to level the playing field, that's what she
23 basically said and that it was best for me to speak about
24 myself rather than for them to get information from others.

25 So at that time, and shortly after the February

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1 12th interview, there was a strategizing press meeting with
2 New Visions and the Department of Education where we all came
3 to an agreeance that the Department of Education would screen
4 all media requests and make the decision whether who should
5 be spoken to and who should do the interview.

6 And so at that point, one of the things that was
7 also discussed was that all interviews would have a press
8 person on the phone.

9 And so with *The New York Sun*, it was a phone
10 interview and David Cantor was on the phone with me and
11 Ms. Garlend, is it Ms. Garlend?

12 Q. Yes.

13 A quick question about your interview by Ms.
14 Gootman of *The Times* that ended up appearing in the February
15 12th article in *The Times*.

16 How long was your interview with Ms. Gootman from
17 *The Times*? This is the February interview.

18 A. I think it may have been somewhere between five
19 minutes or so. It was the end of the day, it was like 6:00
20 or 5:30, and she really wanted to get the story out.

21 MR. LEVINE: When is *The Sun* article or when
22 were you talking, you mentioned a date?

23 MR. MARKS: The interview, March 15th by *The*
24 *Sun*.

25 BY MR. MARKS:

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1 Q. So you were interviewed by Ms. Garland of *The Sun*,
2 David Cantor of the Department of Education, which I'll refer
3 to as DOE Press Office, was on the telephone with you?

4 A. Yes.

5 Q. How long was that interview?

6 A. That was probably, I would say 30 to 45 minutes.

7 Q. Do you remember any of the questions Ms. Garland
8 asked you?

9 A. It was just basically about my work at the DOE,
10 about the school, about my peace building work. And then
11 there were -- there was a question about an organization that
12 had given me an award, the CAIR office of the New York
13 Chapter gave me an award, and she wanted to know about that.
14 It's the Council on American-Islamic Relations.

15 Q. You referred to a meeting which there was a
16 discussion about the strategy, press strategy in relation to
17 KGIA?

18 A. Yes.

19 Q. Where was that meeting held?

20 A. At New Visions.

21 Q. Who was at that meeting?

22 A. From the Department of Education, Melody Myer was
23 there. And Debbie Marks from the Office of New Schools, and
24 Melody Myer is from the Press Office. And then members of
25 New Vision, the New School Development Office and members of

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1 their Media Communications office.

2 Q. You were present at that meeting, too?

3 A. Yes, I was. And, actually, my partnering
4 organization, the Arab American Family Support Center.

5 MR. MARKS: Could you mark this, please?

6 (Whereupon, the aforementioned Associated
7 Press document, dated 4/16/07, was marked as
8 Defendants' Exhibit D for identification as of this
9 date by the Reporter.)

10 BY MR. MARKS:

11 Q. Before I show you Exhibit D, you just mentioned an
12 organization called the Arab American Family Support Center.
13 And what is the Arab -- well, let me ask you if you can just
14 briefly describe what the Arab American Family Support Center
15 is and what role, if any, it had in the creation for the
16 KGIA?

17 A. The Arab American Family Support Center is a
18 nonprofit social service servicing Arab-American immigrants
19 and others who choose to be serviced by them.

20 It's a well-known and respected organization that
21 partnered with me in the New Visions process to develop KGIA.
22 And their role is the fiscal agent of the \$400,000 grant from
23 the Gates Foundation.

24 Q. I just want to show you what's been marked as
25 Exhibit D. Which is an article by *The Associated Press*,

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1 specifically Nahal, N-A-H-A-L, Toosi, T-O-O-S-I, dated April
2 16, 2007, entitled, *"Proposal For Public School Focusing on*
3 *Middle Eastern Culture in New York City Draws Protests"*.

4 And when you've had a chance to look at that, let
5 me know.

6 (Witness perusing the document.)

7 A. Okay.

8 Q. How did it -- do you know whether Nahal Toosi is a
9 man or a woman?

10 A. It's a woman. I had the same question before
11 meeting her.

12 Q. How did it come about -- were you interviewed by
13 Ms. Toosi of *The Associated Press*?

14 A. Yes.

15 Q. Was that interview in person or on the telephone?

16 A. That interview was in person and Melody Meyer was
17 present at the interview.

18 Q. And where did that interview take place?

19 A. That was arranged by Melody Meyer. It took place,
20 I believe, in a Pace University building.

21 Q. How long did the interview last?

22 A. About 45 minutes.

23 Q. How did it come about that Ms. Toosi -- how did you
24 hear that Ms. Toosi wanted to interview you?

25 A. By the Press Office. And she actually had e-mailed

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1 me. Any e-mails that I got from reporters or phone calls, I
2 referred them to the DOE. So I referred the e-mail to Melody
3 for her to screen them.

4 Q. But did you first learn that Ms. Toosi wanted to
5 contact you -- the interview was from an e-mail from
6 Ms. Toosi to you?

7 A. Yes.

8 Q. The article contains both quotations from you and
9 statements that are attributed to you they are not quoted.

10 Are the quotations that are attributed to you in
11 the article accurate?

12 A. Yes.

13 Q. Are the statements that are attributed to you but
14 not quoted, direct quotes, are they accurate?

15 MR. LEVINE: Well, wait. I'm sorry, the
16 latter -- the first question was about quotes. The
17 latter is: Is everything else in the article
18 accurate?

19 MR. MARKS: No.

20 BY MR. MARKS:

21 Q. For example, there are obviously some portions of
22 the article that contain -- are quotations and, for example,
23 there is another, there is a statement in the article on page
24 two of it which does not appear to be a quote but appears to
25 be a statement attributed to her. It says, "She said the

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1 school won't shy away from sensitive topics such as
2 colonialism and the Israeli/Palestinian crisis."

3 So what I'm asking is that, that statement is not
4 in quotes but it appears that Ms. Toosi is attributing it to
5 you.

6 So I'm asking you: Is that correct, is that what
7 you said?

8 A. Not exactly the way that she wrote it.

9 Q. What did you say?

10 A. I expressed to her that we will be learning the
11 history of the U.S. as well as the world. And if there were,
12 you know, whatever, if there are times where we do come to
13 sensitive topics, the student will have the opportunity,
14 through their critical thinking skills, to learn about
15 whatever the issue is from all sides and develop their own
16 conclusion.

17 Q. So did you make any reference at all to either the
18 topic of the words colonialism or the Israeli/Palestinian
19 crisis?

20 A. No, those were not my words. Those were her --
21 what she basically interpreted.

22 Q. But the portions of the article that are in
23 quotations that quote you, are those quotes accurate?

24 A. Yes.

25 MR. MARKS: Could you mark this, please?

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1 (Whereupon, the aforementioned *New York Times*
2 article, dated 5/4/07, was marked as Defendants'
3 Exhibit E for identification as of this date by the
4 Reporter.)

5 BY MR. MARKS:

6 Q. I'm going to show you what's been marked as
7 Defendants' Exhibit E, which is an article, dated May 4,
8 2007, from *The New York Times* by Julie Bosman, entitled,
9 "Plan to Open an Arabic School in Brooklyn Arouses Protest."

10 And when you've had a chance to, I'd ask you to
11 review that article, specifically look for, there are
12 statements that are -- you're quoted in that article, so I
13 just want, if you can just focus on those but just look at
14 the whole article.

15 (Witness perusing the document.)

16 MR. LEVINE: If you can ask her to comment on
17 the whole article, of course, she should read it
18 line by line, but if you're just going to ask her
19 about the quotes, maybe move to the quotes.

20 BY MR. MARKS:

21 Q. I've shown you what has been marked as Defendants'
22 Exhibit E, which I've already identified as a May 4, 2007
23 article from *The New York Times* by Julie Bosman.

24 Were you interviewed by Ms. Bosman of *The Times* in
25 May of 2004?

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1 A. Yes, I was.

2 Q. Was the interview in person or on the telephone?

3 A. It was on the telephone with David Cantor on the
4 other line.

5 Q. How long did that interview last with Ms. Bosman?

6 A. It may have been 15 or 20 minutes. I don't have a
7 clear recollection.

8 Q. How did it come about that the interview with
9 Ms. Bosman took place?

10 A. The Press Office inquired about it. She had called
11 and then after screening and talking to her, they felt that
12 it was a good opportunity to interview in *The New York Times*
13 to, you know, to deal with some of the negative things that
14 were being written about the school in *The New York Sun*, and
15 the same thing for *The Associated Press*. It was, you know, a
16 positive outlook that they felt would be good to interview
17 in.

18 Q. I believe on the fifth paragraph on the first page,
19 there is what appears to be a quote from you. The sentence
20 begins with, "Ms. Almontaser says, "She is prepared for the
21 reaction..." and there is a couple quotes from you --
22 attributed to you, are those quotes accurate?

23 A. They are accurate in the way that they were
24 written, yes.

25 Q. And if you turn to page three of the article which

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1 is the last page, there is another quote from you in the
2 second paragraph, do you see that?

3 (Witness perusing the document.)

4 A. Is it the one, "The location right now"?

5 Q. Yes. Is that quote accurate?

6 A. Yes.

7 Q. In May 2007, were you interviewed by a Reporter by
8 the name of Jeanine, J-E-A-N-I-N-E, Ramirez, R-A-M-I-R-E-Z,
9 from the television station NY1?

10 A. Yes.

11 Q. Was that interview taped?

12 A. Yes.

13 Q. Do you know whether that interview aired on NY1?

14 A. I believe it did.

15 MR. LEVINE: What's the time of it?

16 MR. MARKS: May 2007, I think it was -- I
17 don't know if you remember the date, but it was in
18 early May 2007, if you recall?

19 A. Yes.

20 Q. Where did the interview with Ms. Ramirez of NY1
21 take place?

22 A. It took place at 52 Chambers where Melody Meyer
23 arranged for her to interview me.

24 Q. Was anyone else present during the interview other
25 than you and Ms. Ramirez?

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1 A. Melody Meyer.

2 Q. How did it come about that you learned that
3 Ms. Ramirez wished to do an interview with you?

4 A. Through Melody Meyer and I think they may have
5 called me or she may have called me and I referred her to the
6 Press Office.

7 Q. How long did the interview with Ms. Ramirez last?

8 A. Maybe ten, 15 minutes, I'm not a hundred percent
9 sure.

10 MR. MARKS: Could you mark this, please?

11 (Whereupon, the aforementioned NY1 article was
12 marked as Defendants' Exhibit F for identification
13 as of this date by the Reporter.)

14 BY MR. MARKS:

15 Q. Before you look at Exhibit F, is 52 Chambers --

16 A. The Department of Education, the Tweed Courthouse.

17 Q. Is that the headquarters of the Department of
18 Education?

19 A. Yes, it is.

20 Q. Defendants' Exhibit F is a printout from NY1 News,
21 entitled, "*Arabic Language School Struggles to Find a Home.*"
22 It's dated May 4, 2007, and the name of Jeanine Ramirez
23 appears at the bottom of it.

24 It's a one-page document. There are some quotes
25 attributed to you in that article, I mean, in this printout

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1 from NY1 News concerning the interview that was taped.

2 Can you look at Defendants' Exhibit F and tell me
3 whether the quotes attributed to you are accurate?

4 (Witness perusing the document.)

5 A. Yes, they are attributed to me.

6 MR. MARKS: Could you mark this, please?

7 (Whereupon, the aforementioned New York Post
8 article, dated 5/5/07, was marked as Defendants'
9 Exhibit G for identification as of this date by the
10 Reporter.)

11 BY MR. MARKS:

12 Q. Showing you what's been marked as Defendants'
13 Exhibit G, which is an article in *The New York Post*, dated
14 May 5, 2007, entitled, "*City Arab School Move Defeated*" and
15 it's by David Andreatta, A-N-D-R-E-A-T-T-A.

16 Were you interviewed by a Reporter by the name of
17 David Andreatta from *The New York Post*?

18 (Witness perusing the document.)

19 A. I don't believe, for this article, I was
20 interviewed. I don't recall.

21 Q. There is a -- at the last sentence of Defendants'
22 Exhibit F it states: "The Principal of Khalil Gibran, Debbie
23 Almontaser, said the parents concerns were "valid" and she
24 was not disappointed with the outcome."

25 A. I don't recall ever speaking to him. There were

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1 times that Melody Meyer did get calls from press and she
2 would call me to ask me what my thoughts were and she would
3 relay the message.

4 I don't recall. It's possible, but I don't
5 remember.

6 Q. Do you recall seeing this article on or about the
7 date it was published?

8 A. I don't remember. I don't read *The New York Post*.

9 MR. MARKS: Could you mark this, please?

10 (Whereupon, the aforementioned *Brooklyn Paper*
11 article was marked as Defendants' Exhibit H for
12 identification as of this date by the Reporter.)

13 BY MR. MARKS:

14 Q. Showing you what's been marked as Defendants'
15 Exhibit H, which is a May 19th article from *The Brooklyn*
16 *Paper* by Dana Rubinstein entitled, "Exclusive: Almontaser
17 *Speaks! Gibran School Principal Steers Down Her Critics*".

18 Were you interviewed in May 2007 by a Reporter by
19 the name of Dana Rubenstein from *The Brooklyn Paper*?

20 A. Yes.

21 Q. What is *The Brooklyn Paper*? Is it a local...

22 A. It's a local Brooklyn paper that's read in
23 Brooklyn.

24 Q. So it's a local Brooklyn paper?

25 A. Yes.

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1 Q. This article contains a series of questions and
2 answers over the two-and-a-half pages, as well as your
3 photograph.

4 Is the article accurate as far as the answers you
5 gave?

6 A. I would have to look at it.

7 (Witness perusing the document.)

8 MR. LEVINE: There is not any particular one
9 you want her to comment on, you want her to comment
10 on all of them?

11 MR. MARKS: Yes.

12 A. Okay, I reviewed it.

13 Q. Are the answers you gave to the -- the answers as
14 set forth in the article that you gave to the questions
15 accurately reported?

16 A. To the best of my knowledge. To the best of my
17 memory, sorry.

18 Q. How did it come about that you ended up being
19 interviewed by Ms. Rubenstein of *The Brooklyn Paper*?

20 A. Ms. Rubenstein had been calling emphatically the
21 Department of Education requesting for an interview and they
22 also calling me and I or -- just calling me. They didn't
23 e-mail me. And I continually referred the calls -- now, when
24 I say they called me, I had never -- I don't believe I ever
25 spoke to Dana, but I'm not a hundred percent sure, but I

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1 would take the number down and call Melody and give her the
2 information for the Reporter.

3 So *The Brooklyn Paper* spent a great deal of time
4 writing negative things about the school and the Press Office
5 was concerned about how they were portraying the school and
6 finally at that point, the paper was writing things about me
7 specifically, saying that I'm not returning their calls and
8 I'm not making myself available.

9 So the Press Office felt that it was probably a
10 good idea and they -- when I say "they", Melody spoke with
11 Dana in terms of what the story is going to be, how is she
12 proposing to do it. And upon Melody calling me back, she
13 told me the interview was going to be a question and answer
14 format, and Melody Meyer was on the phone with me and Dana.

15 Q. So this was a telephone interview?

16 A. Yes.

17 Q. Ms. Myer from the DOE Press Office was on the line
18 with you and Ms. Rubenstein from *The Brooklyn Paper*?

19 A. Yes.

20 Q. How long did the interview last?

21 A. Maybe 30 to 45 minutes.

22 Q. Were you supplied with the questions in advance
23 before the interview was conducted?

24 A. No.

25 MR. MARKS: Could you mark this, please.

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1 (Whereupon, the aforementioned document, dated
2 5/20/07, was marked as Defendants' Exhibit I for
3 identification as of this date by the Reporter.)

4 BY MR. MARKS:

5 Q. Before I ask you about Defendants' Exhibit I, I
6 know we have talked about a number of interviews that, of
7 you, by members, various members of news media, and if we
8 have to go through them again individually we can, but before
9 each of these interviews actually took place, were you
10 prepped by any member of the DOE Press Office concerning how
11 to respond to the questions?

12 A. For *The New York Sun* interview, I was prepped and I
13 was basically informed what, you know, what to expect. It
14 was a profile, and that was done by David Cantor. The piece
15 was never published, they scrapped it.

16 And I'm just trying to remember all of the ones
17 you've showed me.

18 Q. We'll just run through it quickly. It was the
19 February 13th article by Elissa Gootman of *The Times*?

20 A. No, I was not prepped for that. And the protocol
21 procedure for speaking to press was not in place at that
22 time. And all I got was approval from Melody Meyer to do the
23 interview.

24 Q. For your interview by Ms. Toosi of *The Associated*
25 *Press* in April of 2007, did anyone from the DOE Press Office

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1 prep you for that interview?

2 A. It wasn't a prep, but it was just giving me an
3 overview of what Ms. Toosi was looking for and what the piece
4 was going to be like.

5 Q. And who gave you that overview?

6 A. Melody Myer.

7 Q. For the May 2007 interview by Julie Bosman at *The*
8 *New York Times*, were you prepped in advance for that?

9 A. I was not prepped, but we went over what the
10 article was going to be about.

11 Q. When you say "we went over"?

12 A. With David Cantor and, you know, what are some of
13 the things that she may ask me and that, yes, it wasn't, you
14 know -- yes.

15 Q. So Mr. Cantor discussed with you potential
16 questions that Ms. Bosman may ask you?

17 A. Yes.

18 Q. For the interview by Jeanine Ramirez of NY1, was
19 there a discussion with you and any member of the DOE Press
20 Office before that interview about questions you might be
21 asked, about how you might want to answer certain questions?

22 A. I don't remember for that one.

23 Q. For the interview by Dana Rubinstein of *The*
24 *Brooklyn Paper*, was there discussion with any member of the
25 Press Office about what questions Ms. Rubinstein might ask or

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1 how you may answer certain questions?

2 A. There was a discussion with Melody Myer who said to
3 me that Dana was basically wanting to make this an exclusive
4 because of the fact that I hadn't talked to them, and that it
5 is going to be question and answer, and that it was most
6 likely going to be about the school, the mission, the vision
7 and what the school is setting out to do.

8 Q. If you would now turn to Exhibit I.

9 Exhibit I is an article from *The Daily News*,
10 entailed, it's an article or appears to be an abdec piece
11 entitled, "Arabic Public School We Unite Not Divide Us".
12 Indicates it's by Debbie Almontaser and that it's posted on
13 Sunday, May 20, 2007.

14 At the bottom it says, "Almontaser is Principal
15 Designee of the Khalil Gibran International Academy."

16 As of May 20th, you were not the Interim-Acting
17 Principal; is that right?

18 A. That is correct.

19 Q. Do you know what this reference to "Principal
20 Designee" means?

21 A. No, I have no idea what it means.

22 Q. Did you write in whole or in part the abdec piece
23 that's Defendant's Exhibit I?

24 A. I wrote the abdec which.

25 Q. Did you write in whole or in part Defendant's

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1 Exhibit I?

2 A. I wrote the abdec which was much longer, and I
3 forwarded it to David Cantor, who then revised it to make it
4 shorter and more succinct to what we needed it to say, being
5 that it was abdec and there was a specific number of words
6 that needed to be there.

7 Q. How did it come about that an abdec piece by you
8 ended up being submitted to *The Daily News*? Did *The Daily*
9 *News*, to your knowledge, contact the DOE Press Office, was
10 this an idea that was discussed between you and others at the
11 DOE Press Office to submit this?

12 A. It was something that was discussed between the
13 Press Office and *The New York Daily News* and then it was
14 brought back to me as an opportunity to be able to talk about
15 the school and the way that we wanted to be presented and
16 that it was a good way of telling the school's, you know,
17 mission and vision and history.

18 Q. Who advised, who talked to you about initially
19 submitting the abdec piece?

20 A. David Cantor.

21 Q. He is the head of the DOE Press Office?

22 A. I believe so.

23 Q. Other than the interviews with the members of news
24 media that you've just testified about, were you interviewed
25 by any other members of the news media about KGIA before

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1 August 5, 2007?

2 A. *The New York Post*.

3 Q. That's on August 5, 2007?

4 A. Yes, I think that's it, but I'm not a hundred
5 percent sure. And if you have anymore you want to show them
6 to me.

7 Q. Other than the abdec piece that's Defendants'
8 Exhibit I, that was published by *The New York Daily News*, did
9 you submit any other writings to the news media that ended up
10 being published in the newspaper or other daily newspaper?

11 A. Not that I recall. *The Daily News* Editorial Board
12 did a piece and they interviewed me with David Cantor and I
13 don't know, you know, I don't know what the article or when
14 it -- I believe it came out before the abdec that I wrote
15 with David.

16 Q. The abdec piece is dated May 20, 2007, so you met
17 with -- you and David Cantor met with *The Daily News*
18 Editorial Board?

19 A. It was over the phone. I was with David in his
20 office.

21 Q. Do you remember who from -- was it more than one
22 person on the line from *The Daily News* end of it that you
23 were aware of?

24 A. I think there were a couple of people from *The*
25 *Daily News*, but I don't remember.

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1 Q. How long was the -- did the people from *The Daily*
2 *News* ask you questions during this interview?

3 A. Yes, they did.

4 Q. And David Cantor was also on the line from the
5 Press Office?

6 A. Yes.

7 Q. How long was the interview by *The Daily News*
8 Editorial Board?

9 A. Maybe 30 or 40 minutes, I'm not sure.

10 Q. I'm going to ask you some questions about when you
11 became Interim-Acting Principal of KGIA.

12 Could you describe the process by which you became
13 the Interim-Acting Principal of KGIA on July 2, 2007?

14 A. There certainly wasn't an induction, you know,
15 event.

16 Q. Did someone tell you you had been named
17 Interim-Acting Principal?

18 A. Yes, in one of the New School intensive sessions
19 Joshua Thomases and Julian Cohen let all of us know that as
20 of July 1, 2007, that we were all going to become officially
21 acting interim principal's of our schools and that we will be
22 officially getting paid as of July, and so that was really
23 it. It was just an announcement.

24 And then New Visions had a June 28th professional
25 development session, where they also announced that to the

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1 teams that were working through them in terms of being New
2 Vision schools, and they had a small little event for us
3 where they, you know, decorated all of the, you know, the
4 acting interim principal's and calling them up and they gave
5 us nameplates with our names and the title Principal.

6 Q. So there were others beside yourself, when you
7 became Interim-Acting Principal of KGIA, there were other
8 persons that were named Interim-Acting Principal's of other
9 schools?

10 A. Yes, there were 40 schools in total.

11 Q. And at that point when you were named
12 Interim-Acting Principal, you said your salary increased from
13 mid-70s to \$120,000 a year?

14 A. Yes.

15 Q. What were the differences in your duties, if any,
16 between the Project Director position you had before July 1,
17 2007, and the Interim-Acting Principal position you held as
18 of July 2, 2007?

19 A. There really wasn't any specific difference. It
20 was still -- I was still doing the work that needed to get
21 done for the opening and development of the school.

22 Q. Do you have any understanding of the term
23 interim-acting?

24 A. Yes, I do.

25 Q. What's your understanding of that term?

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1 A. My understanding of that is that you're in the
2 position on an interim basis and that there is a process, the
3 C-30 process, where you have to interview and then be
4 selected and pointed by the Chancellor.

5 Q. Do you have any understanding whether or not
6 Interim-Acting Principal can be removed from that position
7 without charges and a hearing?

8 A. I understand that.

9 Q. So you understand that Interim-Acting Principal can
10 be removed from that position without charges and a hearing;
11 is that right?

12 A. Yes.

13 Q. When you were appointed Interim-Acting Principal,
14 did you understand that a Principal for KGIA would be
15 selected through the C-30 process at some point?

16 A. Yes, I understood that.

17 Q. C-30 process is the process for selecting
18 principal's and assistant principal's that is set forth in
19 Chancellor's Regulation C-30?

20 A. Yes.

21 Q. You understand that if someone is appointed a
22 Principal after the C-30 process, that person has to serve a
23 probationary period?

24 A. Yes.

25 Q. Do you know how long that probationary period is?

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1 A. I don't know if it's two or three years, I don't
2 recall.

3 Q. Did you have any understanding when you were made
4 Interim-Acting Principal of KGIA in July of 2007 as to when
5 the C-30 process to select a Principal for KGIA would take
6 place?

7 A. I was informed by the Office of New Schools that
8 they were going to be doing it as soon as the schools opened
9 to help, you know, to help appoint all of the New School
10 acting interim principal's right away in the first semester.

11 And sometime in June, I don't recall exactly when,
12 at a meeting with some of the Office of New Schools
13 personnel, Peter Dylan had said to other people who were from
14 the Office of New Schools, that sometime in August it would
15 be great for them to help me fill out the applications so it
16 would not distract me in September when the school opened, to
17 just get it done and over with, and submit as soon as the
18 posting goes up.

19 Q. So the first step in the process for selecting a
20 Principal for or Assistant Principal for a school is that the
21 Department of Education posts the position?

22 A. I'm sorry, say that again?

23 Q. The first step in the process, the selection
24 process for Principal or Assistant Principal in the C-30
25 process, is that the position is posted by the Department of

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1 Education?

2 A. Yes.

3 Q. Where is that position posted?

4 A. On the DOE website.

5 Q. Do you know when the posting for the position of
6 Principal at KGIA was posted on the DOE website?

7 A. No, I don't know when exactly it was posted.

8 Q. Do you know whether it was posted in August of
9 2007?

10 A. I don't -- I did not go on the website to check if
11 it was. The only recollection that I have that it was going
12 up in August, was the e-mail that Rosemary Stewart copied me
13 onto HR when they requested that the posting be posted for
14 KGIA.

15 Q. Did there come a time when you looked on the
16 Department of Education website to see whether or not the
17 position of Principal for KGIA had been posted?

18 A. Yes, I did.

19 Q. When was the first time you looked on the website
20 for that purpose?

21 A. The first time that I looked, I don't remember an
22 exact date but it was in October, and it was brought to my
23 attention that it was up on the website by Garth Harries from
24 the Office of New Schools, and he told me that the posting
25 was going to close on October 18th. When I looked on the

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1 website I saw that it was going to be closing on October
2 16th.

3 Q. And you submitted an application for the position
4 of Principal of KGIA?

5 A. Yes.

6 Q. That was on October 17, 2007?

7 A. No, it was October 16th.

8 Q. Was there any reason why you did not apply for the
9 Principal -- position of Principal at KGIA before October 16,
10 2007?

11 A. I'm sorry, could you repeat that?

12 Q. Is there any reason you did not apply for the
13 position of Principal at KGIA before October 16, 2007?

14 A. It was brought to my attention by Garth Harries and
15 we were in discussion about KGIA and other possibilities and
16 my lawyer was also in discussion with Michael Best, who is
17 the General Counsel for the DOE, and Mr. Levine was trying to
18 get Mr. Best to meet with him to discuss the matter and
19 finding a way to deal with this issue, you know, on a one to
20 one.

21 And Mr. Best, to my knowledge, was not cooperative.
22 Did not want to have a meeting and my lawyer let him know,
23 then, that I would be applying for the position and that was,
24 I believe, October 12th, that Friday if -- I don't know the
25 accurate date, but it was that Friday.

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1 I was then informed by my lawyer that that was
2 something that I needed to do on Saturday, which was a
3 holiday for me. I did not get a chance to look at the
4 posting on the website.

5 I did the following morning, and did not find the
6 posting up. There was a message that said that it had been
7 removed and will no longer -- I don't remember what the
8 message said, but that it was taken down and we apologized
9 for the inconvenience or something to that effect. I don't
10 remember the exact language.

11 I called my lawyer and let him know. He then
12 called Mr. Best that morning and then on my lunch break, I
13 looked to see if the posting was back and it was back up
14 around 1:00.

15 Q. Is there anything that -- strike that.

16 Before you became Interim-Acting Principal of KGIA,
17 had you ever served as an Interim-Acting Principal for a new
18 school?

19 A. No.

20 Q. Before you became Interim-Acting Principal of KGIA,
21 had you ever served as an Assistant Principal at any school?

22 A. No.

23 Q. Either as a permanent or interim-acting?

24 A. No.

25 Q. Before you became Interim-Acting Principal of KGIA,

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1 did you have any experience in school-based administration?

2 A. I did in two summer programs, one year in writing a
3 summer program at P.S. 295 in District 15 which was, I
4 believe it was in the summer of 2000, if I'm not mistaken,
5 and then at P.S. 94.

6 Q. When were you --

7 A. Yes, P.S. 94 was 1999. And then 2000 I believe it
8 was P.S. 295.

9 Q. This is the summer of 1999 at P.S. 94?

10 A. The summer programs, yes.

11 Q. What was your -- what administrative experience did
12 you have that summer?

13 A. I was basically responsible for professional
14 development, student enrollment, attendance, making sure that
15 everything was running smoothly, meeting with teachers, just
16 the day-to-day basis of running a program, a summer program.

17 Q. What sort of summer program was this?

18 A. It was an elementary summer school program.

19 Q. Elementary are grades, what grades is that?

20 A. I don't remember exactly what grades were there,
21 but it's an elementary school so I think it was probably
22 first graders to fifth graders. It was students who needed,
23 you know, extra support.

24 Q. When you say, "summer program," what months
25 encompass the summer?

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1 A. July, after -- well, it was July and maybe two
2 weeks of August where students had to take tests, if they
3 were in the upper grades.

4 Q. In the summer in P.S. 95?

5 A. 295.

6 Q. Excuse me, 295.

7 In the summer of 2000, what experience did you have
8 in the summer program?

9 A. It was the same thing, working with teachers,
10 supervising, making sure students were there, you know, for
11 their classes, the lunchroom.

12 Q. That was also for the month of the July 2000 and
13 two weeks of August of 2000?

14 A. Yes. And then this spring I interned --

15 MR. LEVINE: Meaning spring of 2007?

16 THE WITNESS: Yes, 2007.

17 A. I interned at Thurgood Marshall Leadership Academy
18 up in Harlem which is a seventh through twelfth grade school.

19 Q. How many days a week did you intern at the Thurgood
20 Marshall?

21 A. I was there every day of the week unless I was
22 pulled out for a meeting at New Visions or the DOE, et
23 cetera.

24 Q. What did you do and how long a period was this
25 internship?

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1 A. It was from February to sometime in May.

2 Q. What did you do at the internship?

3 A. I shadowed the Principal and I worked with her
4 designated AP's who were working on specific areas.

5 I worked with the AP who was actually responsible
6 for budgeting, so I had the opportunity to learn from her the
7 use of Galaxy and ordering and what have you.

8 And the other AP was someone who was working on
9 instruction, science, so I was just shadowing him, some of
10 the things that he was doing, as well as working with her
11 literacy coach in terms of professional development and
12 curriculum development and just being there on a day-to-day
13 basis, you know, around issues of behavior, et cetera.

14 I also was with her middle school person. I spent
15 some time with her middle school person who was somewhat like
16 coordinator, a dean, but just getting an understanding of
17 middle school. And I worked on articulation which was
18 enrolling students for the incoming seventh grade and helping
19 develop that and getting parents to come in for interviews
20 and students to come in for interviews, et cetera.

21 Q. This is at the Thurgood Marshall...

22 A. Leadership Academy.

23 Q. Is that a functioning school?

24 A. Yes, it's a public school. It's a small new
25 school.

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1 Q. How did this internship come about?

2 A. This was -- it came about after some discussion
3 with the Office of New Schools and with New Visions where
4 they felt that I had been out of a school setting for several
5 years because I was working on a regional or district level,
6 and they felt that it would probably be a good idea to
7 reacclimate myself by being in a school setting.

8 And so it was arranged by New Visions for me to
9 intern at Thurgood Marshall. And the way that they had to do
10 it was to, in order to keep me on salary, not to lose my
11 health benefits, they paid the Department of Education Office
12 of Youth Development whatever my salary was going to be from
13 February through the end of May -- I'm sorry, no, through the
14 end of June.

15 MR. LEVINE: Let's take a break.

16 (Whereupon, a short recess was taken.)

17 (Time noted: 12:29 p.m.)

18 MR. MARKS: Back on the record.

19 (Time noted: 12:49 p.m.)

20 BY MR. MARKS:

21 Q. Ms. Almontaser, did there come a time when you
22 became aware that a Reporter for *The New York Post* by the
23 name of Chuck Bennett had asked to interview you?

24 A. Yes, I did become aware of that time.

25 Q. How did you become aware that Mr. Bennett had asked

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1 to interview you?

2 A. He reached out to the Press Office and he had also
3 left me a voicemail and he also e-mailed me on my personal
4 e-mail address.

5 Q. Did you respond to his e-mail that was sent to your
6 personal e-mail address?

7 A. No, I did not.

8 Q. You also heard from the Press Office that he had
9 made a request to them to interview you?

10 A. Yes, he had made a request and others had made a
11 request.

12 Q. Do you have a DOE e-mail address and a personal
13 e-mail address?

14 A. Yes.

15 Q. Do you have one personal e-mail address?

16 A. Yes.

17 Q. Is that the AOL account?

18 A. Yes.

19 Q. You said that Melody Myer had told you that?

20 A. Yes, she called me Friday morning, I think, around
21 11-ish and she had e-mailed me as well to let me know that
22 *The Post* as well as ABC News had contacted her, and the
23 e-mail that she e-mailed, she had forwarded a press release
24 that was put out by Stop the Madrassa Coalition, and so she
25 wanted to know -- she wanted to know what -- if I knew

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1 anything about this organization and what the word meant.

2 Q. The word "Madrassa"?

3 A. No, the word "Intifada" because that was the focus
4 of their press release.

5 Q. If you take a look at the Complaint which is
6 Exhibit B, I'll just direct your attention to paragraph 39 of
7 the Complaint.

8 (Witness perusing the document.)

9 A. Okay.

10 Q. In paragraph 39 of the Complaint, it's alleged that
11 Mr. Bennett sent Melody Myer the e-mail with a list of
12 questions that he, on August 5, 2007, and that Ms. Myer sent
13 those questions of Mr. Bennett's to you; is that right?

14 A. Yes.

15 Q. The questions -- the Exhibits are annexed to the
16 Complaint. I just don't have tabs here, but the questions
17 are those that are Exhibit...

18 MR. LEVINE: Did you say Exhibit R?

19 MR. MARKS: No, I said they are Exhibit B.

20 Those are the questions that are Exhibit B to the
21 Complaint.

22 MR. LEVINE: This copy doesn't have the
23 questions.

24 BY MR. MARKS:

25 Q. I'm sorry. Ms. Meyer sent you, actually, if you

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1 look at -- did Ms. Meyer send you the list of questions that
2 Mr. Bennett had asked?

3 A. Yes, she did.

4 Q. Did you draft responses to those questions?

5 A. Yes, I did.

6 Q. Are Mr. Bennett's questions and your draft response
7 to those questions part of the e-mail that's Exhibit C to the
8 Complaint?

9 A. Can you repeat the question, I'm sorry?

10 Q. Are the questions that Mr. Bennett -- Exhibit C to
11 the Complaint is an e-mail that contains what appears to be a
12 list of questions numbered 1 to 5, and there appears to be
13 below the questions, there appear to be answers to each of
14 those questions.

15 So I'm asking: Are -- does Exhibit C contain the
16 questions that Mr. Bennett wanted to -- was asking and your
17 draft responses to those questions?

18 A. Yes.

19 Q. Did anyone ask you to draft responses to
20 Mr. Bennett's questions?

21 A. Yes.

22 Q. Who asked you to draft responses to Mr. Bennett's
23 questions?

24 A. Melody Myer actually forwarded them.

25 Q. Do you know whether your draft responses were sent

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1 to Mr. Bennett?

2 A. I'm sorry?

3 Q. Do you know whether the responses to Mr. Bennett's
4 questions that you drafted were sent to him?

5 A. I don't know.

6 Q. You were interviewed by Mr. Bennett of the Post on
7 Sunday, August 5th; is that right?

8 A. Sunday, yes.

9 Q. That was a telephone interview?

10 A. Yes.

11 Q. Was anyone on the line with you during that
12 interview?

13 A. Yes.

14 Q. Who was that?

15 A. Melody Myer.

16 Q. Of the DOE Press Office?

17 A. Yes.

18 Q. And how long did that interview last?

19 A. Probably no longer than ten minutes.

20 Q. Before the interview took place, did you speak with
21 David Cantor of the DOE Press Office on August 5, 2005 about
22 the interview?

23 A. I spoke to both. I spoke to Melody and I spoke to
24 David. And the reason I was speaking to both was because I
25 was apprehensive about doing the interview because I don't

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1 trust, didn't trust *The Post* then, nor do I trust them now.
2 And I didn't feel that they were going to represent me or the
3 situation in a positive light.

4 Q. "They" meaning *The Post*?

5 A. *The Post*.

6 Q. Did you have more than one conversation with --
7 well, let's just focus on this, so the record is clear,
8 Mr. Cantor -- did you have conversations with Mr. Cantor on
9 your own before the interview and separate conversations with
10 Ms. Myer or...

11 A. They were separate. They were separate.

12 Q. Did you ever speak with Mr. Cantor and Ms. Myer at
13 the same time before the interview on August 5, 2007?

14 A. I don't recall speaking all three of us on the line
15 together. I don't recall, to the best of my recollection.

16 Q. How many times did you speak with Mr. Cantor before
17 the interview and how many times with Ms. Myer before the
18 interview?

19 A. I spoke with Mr. Cantor once and I spoke -- I
20 believe I spoke with Ms. Myer two times. One time before
21 Mr. Cantor and then Mr. Cantor and then Ms. Myer and then the
22 interview.

23 Q. In the conversations with either Mr. Cantor or
24 Ms. Myer, were there was discussion about what Mr. Bennett
25 might ask and the questions you might ask and how you might

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1 respond to those questions?

2 A. The initial conversation with Ms. Myer was based on
3 the question and we, at that time, I was under the impression
4 that we were going to issue a statement and so that's why I
5 had answered the questions and that was what I felt most
6 comfortable in doing.

7 And Ms. Myer gave me the pros and cons of doing a
8 statement versus doing an interview, and at that point I was
9 still -- I was not convinced that, you know, doing an
10 interview was in the best interest of the school.

11 And then I spoke to Mr. Cantor. And at that point
12 he basically said to me that it would just be best to do it,
13 it would be in the best interest of the school to do the
14 interview, you know, we know what he is looking for. He did
15 prep me. He spoke to me about making sure not to be
16 apologetic about the T-shirt and to basically continually
17 talk about my personal work as a peace builder and my
18 educational professional background and to keep it focused on
19 the school.

20 Q. You've just referred to a T-shirt. Just so the
21 record is clear, what T-shirt are you referring to?

22 A. The T-shirt that Mr. Bennett wanted to talk about.

23 Q. Did the T-shirt have something on it?

24 A. It had the word "Intifada NYC".

25 Q. Do you know who created that T-shirt?

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1 A. An organization called AWAAM, the Arab Women Active
2 in the Arts and Media.

3 MR. MARKS: Could you mark this, please?

4 (Whereupon, the aforementioned *New York Post*
5 article, dated 8/6/07, was marked as Defendants'
6 Exhibit J for identification as of this date by the
7 Reporter.)

8 BY MR. MARKS:

9 Q. Showing you what's been marked as Defendants'
10 Exhibit J, which is a copy of an article from *The New York*
11 *Post*, dated August 6, 2007, by Chuck Bennett, B-E-N-N-E-T-T,
12 and Jana, J-A-N-A, Winter, W-I-N-T-E-R, entitled, "*City*
13 *Principal is 'Revoltng' Tied to 'Intifada NYC' Shirts'*".

14 Defendants' Exhibit J, the August 6th *New York Post*
15 article contains what appears to be quotations from you; is
16 that right?

17 A. Yes.

18 Q. Are the quotes contained in that article an
19 accurate reflection of what you said during the interview?

20 A. Some were and there are others that did not include
21 my entire quotation.

22 Q. Could you tell me what is an accurate quote and
23 what quote is in there does not contain your entire
24 statement?

25 A. The first one which it says the word "Intifada"

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1 basically means shaking off. I had also added to the
2 Reporter that he has to understand that this word has
3 different meanings for different people based on the
4 Palestinian/Israeli conflict where thousands of people have
5 been killed and that was left out.

6 Q. The next quote which begins with, "I understand,"
7 is that accurate?

8 A. Yes.

9 Q. The next quote after that, beginning and it does
10 appear that there is -- there is three dots in the middle of
11 the line, but it begins with "I think it's pretty much an
12 opportunity for girls to express that they are part of New
13 York City society... and shaking off repression."

14 What about that, does that contain your full
15 statement?

16 A. The first part of it up until the dots is something
17 that I said, and then the "shaking off repression" is
18 something that he added from my definition.

19 Q. So the quote that, "I think it's pretty much an
20 opportunity for girls to express that they are part of New
21 York City society" is an accurate quote?

22 A. Yes.

23 Q. When you say, I think it said, "I think it's pretty
24 much an opportunity for girls to express that they are part
25 of New York City society," what did you mean by that when you

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1 made that statement?

2 A. The mission and vision of this organization and
3 what they were doing with the girls, the Reporter was
4 vilifying the teenage girls as wanting to hold an uprising
5 Gaza-style, those were his words, and I didn't agree with his
6 -- the way that he was vilifying the young women. And I
7 explained that it's just a group of girls trying to express
8 themselves to be a part of New York City society.

9 Q. Was your understanding that --

10 A. Their media and arts training, that's what I was
11 referring to.

12 Q. Were you referring at all to the T-shirt in that
13 quote?

14 A. No, I was not.

15 Q. If we just turn to paragraph 50 of the Complaint,
16 Defendants' Exhibit B.

17 In paragraph 50 of the Complaint, you allege that
18 on Thursday morning, August 9th, you received a call from
19 Gloria Rakovic, R-A-K-O-V-I-C, of New Visions and where were
20 you when you received the call from Ms. Rakovic?

21 A. I was in Long Island City at a training that was
22 being hosted by the Office of New Schools.

23 Q. So did you receive a call from Ms. Rakovic on your
24 cell phone?

25 A. Yes.

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1 Q. What did Ms. Rakovic say to you in that phone call?

2 A. She expressed to me that the President of New
3 Visions, Bob Hughes, wanted to see me and if I was available
4 to come to their office as soon as I can.

5 Q. What did you say, if anything?

6 A. I explained to her that I was at a training in Long
7 Island City which I had made the commitment to be at which
8 was going to end at 1:00 -- at 12:00 and I possibly can get
9 there by 1.

10 Q. And Bob Hughes is the Head of New Visions?

11 A. Correct.

12 Q. Did you meet with Bob Hughes and Gloria Rakovic on
13 August 9, 2007?

14 A. Yes.

15 Q. What time did you meet with them?

16 A. One o'clock.

17 Q. How long did the meeting last?

18 A. About an hour.

19 Q. Was anyone else present at the meeting besides you,
20 Mr. Hughes and Ms. Rakovic?

21 A. That was it.

22 Q. Did you take any notes during the meeting?

23 A. No, I did not.

24 Q. Did you make any notes about the meeting after it
25 occurred?

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1 A. Well, just to putting my thoughts together as to
2 what happened for my lawyers, yes.

3 Q. Did you tape record the meeting?

4 A. No, I did not.

5 Q. What did Mr. Hughes, Ms. Rakovic and you say at the
6 meeting?

7 A. Repeat that again, I'm sorry?

8 Q. Did all three of you speak at this meeting?

9 A. Yes.

10 Q. And what did each of you say?

11 A. Upon getting to the meeting, Mr. Hughes basically
12 expressed to me his deep concern about his organization's
13 standing and its partnership with the school, about his Board
14 members as well as his Press Office and the organization was
15 being bombarded by calls.

16 Q. Did he say what were the nature of the calls that
17 they were being bombarded with?

18 A. He expressed that it was in light of everything
19 that had transpired that week with *The Post*.

20 Q. Was he more specific than that?

21 A. He was specific in saying that the comments that
22 were made in *The New York Post* have basically put the school
23 as well as his organization in a place they have never been
24 in before.

25 Q. Those are the comments that are attributed to you

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1 in the article, *The Post* article on August 6, 2007?

2 A. Yes, he was referring to that.

3 Q. Did Ms. Rakovic say anything?

4 A. Ms. Rakovic, throughout the whole time, sat there
5 quietly. Mr. Hughes asked me what were my thoughts and what
6 was my sense about what was going on through the course of
7 the week, and I expressed to him that it was unfortunate that
8 this situation had transpired but that we needed to maintain
9 focus and continue with the school moving forward.

10 And he, at that point, basically said to me that he
11 did not, could not see his organization moving forward unless
12 I step down.

13 Q. Did Mr. Hughes say that the school could not
14 continue with you as its leader and you should resign?

15 A. Yes, he did.

16 Q. And you should resign if you wanted to see the
17 school open or continue?

18 A. Yes.

19 Q. What was your response to Mr. Hughes's statement,
20 that statement by Mr. Hughes?

21 A. My response to him was this is a Department of
22 Education school. I have not heard anything from the
23 Chancellor or my superintendent, and, therefore, if you as an
24 organization, a partner organization want to pull out, that's
25 your decision, but as far as I'm concerned, the Chancellor's

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1 commitment continues and if it means continuing without New
2 Vision as a partner, I'm okay with that decision.

3 And his words to me were, "If we pull out, the
4 Department of Education will absolutely not go forward with
5 the school. The only way the school will go forward is if
6 you resign."

7 Q. Did you respond to that statement?

8 A. I said to him that I could not believe that this
9 was a conversation he was having with me and I just, you
10 know, basing it on what happened with *The Post*. Who is *The*
11 *Post*? And why are we concerned about *The New York Post* and
12 what *The Post* has to say? It's not journalistic reporting
13 that should be trusted or foreseen as an accurate media
14 outlet.

15 And he argued with me and said that it is a media
16 outlet that's important in the City and it is an outlet that
17 many people pay attention to and that was why his
18 organization was being bombarded.

19 Q. Did Ms. Rakovic ever say words to the effect to you
20 that a sensitive school such as KGIA required quick thinking
21 and that you lacked that skill?

22 A. Yes, she did, and that was said after Mr. Hughes
23 was not able to convince me otherwise in resigning. So she
24 was there to basically try to make it seem that I was not
25 qualified, that I did not have the skill set.

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1 Q. What was the conclusion of your meeting with -- I
2 mean, Mr. Hughes had said that you should resign and you said
3 no, words to that effect; is that correct?

4 A. Yes.

5 Q. How did the meeting conclude?

6 A. Well, he -- after Ms. Rakovic said her little, her
7 few words, Mr. Hughes basically said to me that the school
8 will not go forward if New Visions was not a partner in the
9 opening of the school.

10 He also -- at that point, I said to him, "Well, I
11 will only make my decision of anything based on what I hear
12 from the Chancellor and as of right now, I believe that the
13 Chancellor is committed to the school, the Superintendent of
14 District 15 is committed to the school, and if New Visions
15 does not want to stay committed, if I have the Chancellor's
16 commitment, then that is something that I care about."

17 And I said to him, "I want to speak to the
18 Chancellor. I want to hear what the Chancellor's views are
19 on this."

20 He told me that the Chancellor was away and he
21 wasn't sure if he was going to get him, but he would try.

22 I asked him if he had spoken to the Chancellor on
23 this matter, and he did not respond to me.

24 And, again, he tried -- he continually said, "You
25 know, you are wasting your time and this is precious time

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1 that's being wasted. If you want to see the school move
2 forward, you would do this, you would resign and resign
3 gracefully to see the school open, otherwise you continuing
4 will jeopardize its opening."

5 So the arrangement was for him have me talk to the
6 Chancellor.

7 Q. Did you end up talking to the Chancellor?

8 A. So Mr. Hughes and I agreed that at 4:00 he was
9 going to call me back to let me know how I can reach the
10 Chancellor. And he also, at that meeting, said to me that
11 "We'll help you, you know, make this happen. We'll help you
12 draft your resignation letter and we will, you know, help you
13 step out of the position very graceful an admirable way and,
14 you know, we want -- we have a great deal of respect and
15 value for you. You are the founder. You did everything in
16 your power to bring this school to this point and that will
17 not be forgotten, and we want to make sure that that's
18 represented. And we will certainly", meaning him, would find
19 the opportunity to have *The New York Times* highlight and
20 decorate my work as a way to show that it was something that
21 I did.

22 And at that point, I was still apprehensive and I
23 kept saying to him that I can't see myself doing anything but
24 leading KGIA. That I've spent two years of my life
25 dedicating every breathing moment for the development of the

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1 school and to walk away was just very difficult for me.

2 And so that was -- we left it off as him basically
3 saying, "I will contact them. I will help you find another
4 opportunity for you at the DOE or elsewhere, to the best of
5 my ability."

6 So at that point I left and the understanding was
7 at 4:00 that we would reconnect for him to give me the
8 contact information for the Chancellor. And he at that time
9 -- so I left and at 4:00 I called him.

10 Q. After you left the meeting with Mr. Hughes and
11 Ms. Rakovic, where did you go?

12 A. I left his office and I also had mentioned to him
13 that I was going to call some of my colleagues and get their
14 opinion on this because I just could not see that the DOE
15 would pull out because New Visions is pulling out, and I
16 called Sandra Stein.

17 Q. What position does Ms. Stein hold?

18 A. She is the Dean of the Leadership Academy and a
19 former professor of mine when I was in the Aspiring
20 Leadership Program and someone that I highly regard as
21 someone that I would talk to.

22 Q. Did you call anyone besides Ms. Stein?

23 A. I also spoke to Geraldine Brown from the Office of
24 New Schools later that day.

25 Q. Was that later that day meaning between your

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1 meeting with Mr. Hughes and Ms. Rakovic and before your
2 meeting with Deputy Mayor Walcott?

3 A. I don't remember if it was in between or after.
4 And I spoke to -- I then left the -- after speaking to them,
5 I jumped on the train and I went to the ISC Center, the
6 Integrated Service Center.

7 Q. Where is that located?

8 A. 131 Livingston Street.

9 Q. Where is the New Visions office located?

10 A. 8th Avenue and 13th Street.

11 Q. So did you speak with Mr. Hughes again at
12 approximately 4:00 that day?

13 A. Before I spoke to him, I also spoke to Mariano
14 Guzman, who is the Head of Integrated Service Center.

15 Q. What did you say in that conversation?

16 A. I expressed my -- I shared with them what New
17 Visions was saying to me and what the -- and I asked their
18 opinion, if it was true that they would think the Chancellor
19 would pull out if I didn't resign, pull support and let the
20 school fail or not open the school entirely.

21 And his recommendations were, it's best that you do
22 what they're asking you to do if you really want to see the
23 school move forward.

24 And Sandra Stein, when I spoke to her on the phone,
25 had expressed the same concerns.

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1 Q. What about Geraldine Brown?

2 A. Geraldine, now to think of it, I spoke to her
3 afterward, that evening.

4 Q. We will get to that.

5 So did there come a time when you talked to
6 Mr. Hughes about 4:00 on August 9th?

7 A. Yes.

8 Q. What was said in that conversation?

9 A. In that conversation he expressed to me that he was
10 not able to get ahold of the Chancellor. However, Dennis
11 Walcott, Deputy Mayor Dennis Walcott, had made himself
12 available to see me or speak with me on the phone. And he
13 gave me his number.

14 I called up Deputy Mayor Dennis Walcott. He and I
15 both agreed that it was best to see each other in person. He
16 asked me to meet him at 250 Broadway in the NYCHA office.

17 Q. NYCHA is the New York City Housing Authority
18 office?

19 A. I don't know. I just know it as NYCHA on the 12th
20 floor.

21 MR. MARKS: Let's take a break for lunch.

22 (Whereupon, a luncheon recess was taken.)

23 (Time noted: 1:29 p.m.)

24 MR. MARKS: Back on the record.

25 (Time noted: 2:29 p.m.)

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* * * *

A F T E R N O O N S E S S I O N

D E B B I E A L M O N T A S E R, resumed and testified
as follows:

MR. MARKS: Could you read back the last
question and answer?

(Whereupon, the referred to question and
answer were read back by the Reporter.)

BY MR. MARKS:

Q. What time did you meet with Deputy Mayor Walcott at
the NYCHA office on August 9, 2007?

A. Well, we spoke around, I think, 4, 4:15.

Q. How long did the meeting take place? How long did
the meeting last, I'm sorry?

A. Well, we spoke around 4:15 and then I jumped on the
train. I think we probably met 4:45, around 4:45, 5:00, I'm
not sure.

Q. How long did your meeting with Mr. Walcott last?

A. Probably between half-hour and 45 minutes.

Q. Did you take any notes during the meeting?

A. No, I did not.

Q. Did you tape record the meeting?

A. No, I did not.

Q. Was anyone else present at the meeting with you and

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1 Deputy Mayor Walcott?

2 A. No.

3 Q. Was this the only meeting that you had with Deputy
4 Mayor Walcott on August 9, 2007?

5 A. No, it was not.

6 Q. When did the second meeting with Deputy Mayor
7 Walcott occur?

8 A. It occurred probably 45 minutes after the first
9 one, 30 minutes, 45 minutes, I don't know. I'm not a hundred
10 percent sure.

11 Q. First I'm going to ask you questions about what
12 occurred during your first meeting with Deputy Mayor Walcott.

13 Before I do that, was the second meeting with
14 Deputy Mayor Walcott also at the NYCHA offices?

15 A. Yes, it was at the NYCHA office. I left and he
16 left after me and he said he was going to call me. And I
17 told him that I wasn't going to go home or get on the train,
18 so I won't miss his call.

19 And then he called me and he asked if I was still
20 in the neighborhood. I said, "Yes." And we reconvened at
21 NYCHA.

22 Q. I'll ask if you could just turn to paragraph 51 of
23 the Complaint. In paragraph 51 in the second sentence it's
24 alleged that later that day "they met", referring to you and
25 Deputy Mayor Walcott.

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1 It says, "Although Walcott made it clear he did not
2 want to be seen publicly with her."

3 How did Deputy Mayor Walcott make it clear that he
4 did not want to be seen publicly with you?

5 A. Upon the completion of the first meeting he said to
6 me, "You should leave first, I don't want us to walk out
7 together and be seen together in public, so I'm going to let
8 you go and then I will leave shortly."

9 Q. Okay.

10 So the first meeting you had with Deputy Mayor
11 Walcott started at about 4:45 p.m. on August 9th and lasted
12 approximately half-an-hour to 45 minutes?

13 A. Approximately.

14 Q. And then there was -- I don't want to say break a
15 period of time where you didn't meet then you reconvened a
16 second time.

17 How long was the second meeting?

18 A. The second meeting was probably 20 minutes.

19 Q. In the first meeting that you had with Deputy Mayor
20 Walcott on August 9, 2007, what did he say to you and what
21 did you say to him?

22 A. Upon my getting there, he was happy to see me and
23 he thanked me for coming. And he began to say to me, "I know
24 this is a very difficult situation and decision. I want you
25 to know that we have prepared for you the opportunity, you

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1 know, we will prepare for you the opportunity to be an
2 Assistant Principal in one of our schools. We'll make sure
3 that you have, you know, a position, and that what you are
4 doing will not go forgotten. We will take care of you. You
5 are a very valued person to this administration. You've
6 worked with our office and you're highly respected and
7 regarded at the Department of Education, and what you're
8 doing is really big of you."

9 And at that point I said to him, "I have not made
10 any decision and nor have I even given any consideration to
11 an assistant principalship." And I don't know where he was
12 under that impression from and he named Bob Hughes as
13 mentioning that I would be interested in an assistant
14 principalship, and that was never discussed with Bob Hughes.

15 I expressed to Dennis Walcott that taking on an
16 assistant principalship is a demotion and there was
17 absolutely nothing I have done in my tenure as Acting Interim
18 Principal that would deserve me a demotion or removal. That
19 I've done everything that I needed to do in my post in the
20 development and creation of the school and hiring the staff
21 and student enrollment and what have you.

22 At that point, he said to me, "Well, then, that's
23 fine. We can certainly look for something else."

24 And I said to him, "Bob Hughes had referred you --
25 referred me to you, to speak to you because Chancellor Klein

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1 was not available. This is a Department of Education issue
2 and my request has been to speak to the Chancellor to hear
3 what the Chancellor has to say about my role and the opening
4 of KGIA."

5 He, at that point, said to me Klein was not
6 available. He was in Colorado in the mountains and not
7 accessible and that he is officially taking his post at the
8 DOE while he is on vacation as a Deputy Mayor of Education.
9 And, therefore, this was something that he was able to handle
10 in his place.

11 And I asked him if he had any conversation with
12 Joel.

13 And at that point he said to me that there have
14 been discussions as far as the Mayor. And that this is not
15 just a Joel Klein decision, but this is a Mayor Bloomberg
16 decision. And that it was something that they have taken
17 into consideration and have discussed thoroughly and that the
18 only way that they can move forward with the opening of the
19 school was if I stepped down from the post.

20 Q. Did you say anything in response to that?

21 (Whereupon, Cynthia Rollings is present for
22 deposition.)

23 A. I, at that point, said to him, "This is what New
24 Visions has said to me and they have not" -- "When I asked
25 Bob Hughes if this was something that he has discussed with

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1 the Chancellor, he did not respond. I am very disappointed
2 that this decision has been made under the grounds of what
3 happened in *The New York Post*, which is a paper that is not
4 well respected and that this was something that they are
5 taking, you know, very seriously based on what was written in
6 *The Post*, where that article just, you know, the T-shirt had
7 absolutely nothing to do with me or the school and,
8 therefore, you know, should have never happened and the Press
9 Office basically, you know, put me in this situation and, you
10 know, what's come out of what they've, you know, put me in
11 harm's way."

12 MR. LEVINE: Let's take a break.

13 (Whereupon, a short recess was taken.)

14 (Time noted: 2:40 p.m.)

15 MR. MARKS: Back on the record.

16 (Time noted: 2:43 p.m.)

17 BY MR. MARKS:

18 Q. So at some point during the first meeting with
19 Deputy Mayor Walcott on August 9, 2007, did he say that he
20 would check with the Department of Education about a position
21 for you other than an Assistant Principal position?

22 A. At that point, yes, he said that he -- and I had
23 said to him that I would not resign unless there was a
24 position that I could put on my resignation letter to show
25 that I have not been demoted or that I have been let go from

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1 the department and he went to the Department of Education.

2 Q. During the first meeting with Deputy Mayor Walcott,
3 did he ever mention the article that appeared in *The Post* on
4 August 6, 2007?

5 A. There was a discussion about, that the current
6 headlines of the week were basically what has caused what has
7 happened, why they were asking me to resign. And he
8 basically said to me, "*The New York Post* is pouncing on us
9 and they will continue to pounce on us, that if you continue,
10 they are going to kill the school. And there is going to be
11 an editorial piece tomorrow morning and they will continue
12 and we can't let them do that."

13 Q. Then there was a -- you basically testified to, as
14 to what was said by you and what said by him in this first
15 meeting.

16 Is there anything else that you can recall that was
17 said by either one of you?

18 A. I can't remember anything else right now.

19 Q. After this first meeting there was a break, let's
20 say, then did you remain -- I can't remember, forgive me if
21 I've asked you this, did you remain in the building or the
22 NYCHA building or did you leave the NYCHA building?

23 A. I left the NYCHA building.

24 Q. Where did you go when you left the NYCHA building?

25 A. I went to 100 Gold Street to see a friend and

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1 colleague there.

2 Q. Who did you see at 100 Gold Street?

3 A. Azi Khalili, who is the Deputy Commissioner of
4 Immigrant Affairs.

5 Q. That's for a City agency?

6 A. Yes.

7 Q. What City agency?

8 A. The Office of Immigrant Affairs in the Mayor's
9 Office for Immigrant Affairs.

10 Q. 100 Gold Street is it in Manhattan?

11 A. I'm sorry?

12 Q. Is 100 Gold Street in Manhattan?

13 A. Yes.

14 Q. Then you went back to the NYCHA offices to meet
15 again with Deputy Mayor Walcott?

16 A. Yes.

17 Q. How did that second meeting -- was it decided at
18 the end of the first meeting that you would reconvene or what
19 happened?

20 A. He said that he was going to call me after his
21 visit at the DOE and I said to him, "I won't leave the City
22 in the event that you call and I'm on the train. I will wait
23 here in the City waiting for your call."

24 And before he called me I spoke to Rosemary
25 Stewart.

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1 Q. What did you say in your conversation with Rosemary
2 Stewart and what did she say to you?

3 A. I explained to her what my meeting was all about
4 with New Visions. And I explained to her that I had met with
5 Dennis Walcott and I was reconvening with him either by phone
6 or we were going to meet. And that he was going to the DOE
7 to see what was available for me.

8 And at that point she just could not believe the
9 chain of events that happened from when I spoke to her in the
10 morning up until that point. And so she told me that she put
11 in two phone calls to Dennis's office, either that she did or
12 she was, I don't remember which of the two, but there was a
13 call. And then she insisted by coming with me to the meeting
14 and I, at that point, didn't say anything to her but I called
15 her back and I told her that it would probably be best for
16 her not to be there, to avoid putting her in any situation.

17 Q. So at some point did you then receive a phone call
18 from Deputy Mayor Walcott?

19 A. Yes.

20 Q. And as a result of that call you returned to the
21 NYCHA offices?

22 A. Correct.

23 Q. If you can estimate, what time of day did this
24 second meeting begin on August 9th?

25 A. Probably 6:30, 7:00. I don't remember. It wasn't

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1 something -- I didn't keep a look at my watch or...

2 Q. Were you and Deputy Mayor Walcott the only
3 participants in that meeting?

4 A. Yes.

5 Q. Did you make any notes of that meeting?

6 A. No.

7 Q. Tape record the second meeting?

8 A. No.

9 Q. In the second meeting on August 9, 2007, what did
10 Deputy Mayor Walcott say to you and what, if anything, did
11 you say to him?

12 A. When he came back and we met, he said to me that
13 upon his visit at the department, there wasn't anything
14 concrete that he was able to identify but said to me, "You
15 have my word, you know, I promise we will take care of you.
16 We will do the right thing by you. You have been an ally to
17 this administration and you've done so much for this school
18 system."

19 MR. MARKS: Do we need to take another break?

20 MR. LEVINE: Sure.

21 (Whereupon, a short recess was taken.)

22 (Time noted: 2:50 p.m.)

23 MR. MARKS: Back on the record.

24 (Time noted: 2:56 p.m.)

25 MR. MARKS: Could you read back the last

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1 answer?

2 (Whereupon, referred to answer was read back
3 by the Reporter.)

4 BY MR. MARKS:

5 Q. After Deputy Mayor Walcott had said "You've been an
6 ally to the administration and you've done so much for the
7 school system", did he say anything after that?

8 A. At that point he didn't say anything.

9 And I said to him, I said, "I just can't believe
10 that it's coming to this. That you, as well as the Mayor, as
11 well as the Chancellor, know my record and know who I am and
12 that *The Post* and the events of this week are basically the
13 synopsis of what's -- the decision that you've made to force
14 me to step down."

15 He then started to explain that they've spent so
16 much capital and that the entire administration is committed
17 to the school and want to see the school open. That they've
18 fallen under so much heat and they want to keep that
19 commitment, but they cannot keep that commitment if I don't
20 step down. He then -- he basically said to me, "I need this
21 decision from you. I want the Mayor to be ready to announce
22 this on the radio tomorrow morning because he is going to get
23 calls and because *The New York Post* Editorial Board is going
24 to be writing something and it will make news tomorrow, and
25 we need to have the Mayor prepared, and we need to have your

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1 resignation letter for him to announce your resignation."

2 Q. Did you say anything in response to his statement?

3 A. I then said to him that "I needed more time to
4 think about this. It was hard for me to accept everything
5 and to have heard all of this from Bob Hughes and then from
6 him and now all of this is being rushed because the Mayor
7 wants to announce this on the radio."

8 And he basically said to me, "I know that you want
9 to see the school move forward and I know that you want to
10 see the school succeed. Right now the only thing that's
11 standing in its way is you withholding from this decision."

12 So then I didn't say anything.

13 He said to me, "If you're not going to, you know,
14 give me the decision tonight, here are my numbers right now."

15 He gave me his cell phone and he gave me, I guess
16 it was a home number, I don't know, and he said to me, "I
17 will be available all night. You know, call me whenever, if
18 you have any questions and if you, you know, if you are
19 ready, but I want that resignation letter by 8:00 a.m.
20 tomorrow morning."

21 Q. Did you say anything in response to that?

22 A. I did not. I took the numbers and I left.

23 Q. After you left the building, did you meet with
24 Superintendent Rosemary Stewart, did she pick you up in her
25 car?

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1 A. Yes, she picked me up in her car.

2 Q. Did you go somewhere with Ms. Stewart after she
3 picked you up?

4 A. Yes, she took me to a diner in Brooklyn Heights for
5 dinner. She had realized I didn't eat all day.

6 Q. I'm not asking you what you told her, but did you
7 tell her what had occurred in the second meeting with Deputy
8 Mayor Walcott?

9 A. Yes, I did.

10 Q. Did she have any reaction? Did she express any
11 reaction to that?

12 A. She was absolutely shocked, couldn't believe what
13 was happening and just like I was, you know, within a drop of
14 the hat, everything changed.

15 And I explained to her what I had to do and how it
16 was not just New Visions but it was also the Chancellor and
17 the Deputy Mayor and the Mayor himself that this is directed.
18 And she was just shocked.

19 She said, "I can't believe this. And I don't know
20 what to say to you. I'm so sorry." And that was it.

21 We -- she said to me, "Well, do you know if the
22 school is going to -- do you have any guarantee if the school
23 is going to open without you?"

24 And I said to her, "That's what they're saying to
25 me. I don't know."

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1 And that was it. We ate and then she dropped me
2 off at my friend's house.

3 Q. What friend's house -- who is the friend she
4 dropped you off at?

5 A. Azi Khalili's house.

6 Q. That's the Deputy Commissioner you had...

7 A. Yes.

8 Q. How long did you remain at Azi Khalili's house?

9 A. I was there for a few hours. My husband was away
10 on a trip and I did not want to go home with my kids in the
11 state that I was in. And I was with Azi for a few hours just
12 processing everything that happened.

13 Q. If I could just direct your attention to
14 Defendants' Exhibit A, which is your November 18th
15 Declaration, and specifically paragraph 12 of that
16 Declaration which states: "That I met with colleagues in the
17 DOE who said that if I resisted resigning, the DOE would
18 ensure that the school failed. Given the choice of seeing
19 the school not open or resigning, I drafted a resignation
20 letter which I faxed to the DOE the next morning."

21 Then it says, "Exhibit to the Complaint."

22 Did you meet with colleagues in the -- the meeting
23 you refer to with the colleagues at DOE, was this after your
24 second meeting with Deputy Mayor Walcott?

25 A. No, this was before the meeting with Walcott. This

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1 was in between -- time in between New Visions and my meeting
2 with Walcott.

3 Q. And these are the people you previously discussed?

4 A. Yes.

5 Q. So after spending several hours at your friend's
6 house on August 9, 2007, you went home?

7 A. Yes.

8 Q. Did you draft your resignation letter after you
9 arrived at home?

10 A. I drafted -- I started drafting my letter at Azi's
11 house.

12 Q. If I can just refer to you Defendants' Exhibit A,
13 which is the Complaint in this action, and Exhibit G to the
14 Complaint, appears to be your resignation letter.

15 Is Exhibit G to the Complaint the resignation
16 letter you drafted, dated August 10, 2007?

17 A. Yes, this was -- the final was -- I finalized it at
18 my home.

19 Q. The version that's attached to the Complaint is the
20 final version?

21 A. Yes.

22 Q. Did anyone other than yourself participate in the
23 drafting of the resignation letter?

24 A. Azi was there with me when I was thinking out loud
25 what I was going to do, what I was going to write.

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1 Q. Did you discuss with Azi the content of the or your
2 thoughts about what the resignation letter should have in it?

3 A. Yes.

4 Q. Did Azi provide any feedback to you?

5 A. Yes, she did.

6 Q. Other than your discussions with your friend, Azi,
7 about the resignation letter, did you discuss with anyone the
8 content of the letter before you sent it to the DOE on
9 August 10, 2007?

10 A. I'm sorry, repeat that again?

11 Q. Other than your discussions with your friend, Azi,
12 about what might potentially be in your resignation letter,
13 did you discuss with anyone else the content of the
14 resignation letter before you submitted it to the DOE on
15 August 10, 2007?

16 A. Yes, there was. Azi's husband was at her home as
17 well and he was there.

18 Q. Anybody else besides Azi and her husband that you
19 discussed the content of the resignation letter before you
20 sent it to the DOE?

21 A. I mean not the exact details, but Bob Hughes called
22 me and he was on the phone asking me what was I thinking to
23 put in the letter and, again, offering to help draft the
24 letter. And then he also offered to wake up early in the
25 morning to review it and give me feedback, and I resisted

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1 from his offer and I told him that it was going to have the
2 language that they were looking for.

3 Q. If I could, looking at the resignation letter, it's
4 addressed to Chancellor Klein; is that correct?

5 A. Yes.

6 Q. In the fifth paragraph of the letter and that's,
7 when I say fifth paragraph, I'm counting the first sentence
8 of the letter as a paragraph. You state -- that begins with
9 the word "unfortunately"?

10 A. Yes.

11 Q. "Unfortunately a small group of highly misguided
12 individuals has launched a relentless attack on me because of
13 my religion. They abuse my religion as the pretext to
14 undermine the academy and have taken my words out of context
15 to distort my record and portray me as something I'm not".

16 Who were you referring to as the small group of
17 highly misguided individuals?

18 A. I was referring to Daniel Pipes and the Stop the
19 Madrassa Coalition who consist of Sarah Springer, Pamela Hall
20 and Jeffrey Weisenfeld, who were quoted in *The New York Post*
21 articles and *New York Sun* articles.

22 Q. When you say, "taken my words out of context", what
23 words, in your view, did this group of individuals take out
24 of context?

25 A. Daniel Pipes and the Militant Islam Monitor blog

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1 went through articles that I had been interviewed on and
2 taken some of the quotes and spliced them or, you know,
3 twisted them to vilify me.

4 Q. So were you also referring to...

5 A. *The New York Post*.

6 Q. August 6, 2007 article?

7 A. Yes.

8 Q. But you're also referring to more than just what
9 your quote were in the August 6, 2007 article?

10 A. Yes.

11 Q. And you're referring to other statements you have
12 made which you said they have taken out of context?

13 A. Yes.

14 Q. The next paragraph of your resignation letter which
15 begins with "your unwavering support", you state that:

16 "Chancellor Klein with your unwavering support in
17 the face of these unprecedented attacks and the love of my
18 family they did not bother me, however, their intolerant and
19 hateful tone has come to frightened some of the parents and
20 incoming students. I have grown increasingly concerned that
21 these few outsiders will disrupt the community of learning
22 when the Academy open its doors on September 4th."

23 Referring to parents, did you mean the parents of
24 students that enrolled at KGIA?

25 A. That sentence was there, that was Azi's

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1 recommendation to help me save face in putting that there.
2 There was one parent who called on August 6th concerned, or
3 August 7th, I don't remember, concerned about the headlines
4 and I was able to reassure her that there should be
5 absolutely no concern on her end. That the Department of
6 Education was doing everything in its power to ensure a
7 successful opening and the safety and security of the school.

8 And she was able to understand that this is a new
9 and innovative school that many people don't have, you know,
10 a brighter understanding of how unique and special it is for
11 children, and that she wanted to be a pioneer by having her
12 child attend the school and, therefore, she maintained her
13 commitment to be there.

14 Q. What was the name of that parent?

15 A. Ms. Johnson.

16 Q. Do you have a first name?

17 A. I don't remember her first name.

18 Q. So I just want to make it clear.

19 Did you understand that any -- do you have an
20 understanding as to whether or not any parents of students
21 who had enrolled at KGIA or incoming students themselves were
22 frightened by the attacks upon you?

23 A. Can you repeat that again, I'm sorry?

24 Q. I'm trying to get -- I mean, you said that the
25 language about -- I'm trying to -- you stated that however

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1 their intolerant and hateful tone of the attacks you referred
2 to has come to frightened some of the parents and incoming
3 students.

4 So I'm just -- and then you said that your friend
5 Azi suggested that language?

6 A. Yes.

7 Q. And I'm trying to find out, and I know you've
8 spoken about a telephone call you had with a parent,
9 Ms. Johnson, but I'm trying to find out why.

10 I mean, did you understand -- do you have an
11 understanding as to whether any of the parents of students
12 that enrolled at KGIA or incoming students were frightened?

13 MR. LEVINE: Other than Ms. Johnson?

14 MR. MARKS: Other than Ms. Johnson.

15 A. No. There was no -- no one reached out to me and
16 there was no drop in student enrollment until my last day,
17 August 10th, nobody had dropped out or called to say, "I'm
18 pulling my child out."

19 Q. So was this sentence accurate at the time that you
20 wrote it?

21 A. Was it accurate at the time I wrote it?

22 Q. Yes.

23 A. No, it was not because I did not have many parents
24 or I didn't have some -- I didn't have parents who were
25 calling. I had one parent who called.

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1 Q. And you wrote this in -- the sentence in the
2 letter, for what reason is the sentence in the letter?

3 A. To save face. To say that I was doing it to ensure
4 the safety and security and that this was in the best
5 interest of the school.

6 Q. So you sent the August 10, 2007 letter to the DOE
7 on August 10th, the resignation letter?

8 A. I faxed it over to Garth Harries.

9 Q. Garth Harries is the Head of the new schools?

10 A. Yes.

11 Q. Why did you resign as the Principal of KGIA?

12 A. I was given absolutely no other choice but to do so
13 in order for the school to open.

14 Q. Did anyone, either Deputy Mayor Walcott or -- did
15 anyone advise you that if you did not resign as the Principal
16 of KGIA that your employment with the Department of Education
17 would be terminated?

18 A. No one used those specific words.

19 Q. Did anyone use those words in any way, whether
20 specifically or in substance, did anyone ever tell you that?

21 MR. LEVINE: Is the question about employment
22 at DOE or KGIA?

23 MR. MARKS: DOE.

24 BY MR. MARKS:

25 Q. Did anyone ever tell you that if you did not resign

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1 as Principal of KGIA, your employment with the Department of
2 Education in whatever, I mean, just your employment at the
3 Department of Education would be terminated?

4 A. No, no one said that to me.

5 Q. I believe you testified earlier that you applied
6 for the position of Principal at KGIA on October 16, 2007?

7 A. Yes.

8 Q. Is there anything that prevented you from applying
9 for the Principal position at KGIA before October 16, 2007?

10 MR. LEVINE: You mean other than what she's
11 testified, like the site was down. I mean, so
12 that's in her testimony.

13 MR. MARKS: Well, I think --

14 MR. LEVINE: I mean, I don't mean to be giving
15 her an answer.

16 BY MR. MARKS:

17 Q. Aside from the site being down, the website being
18 down, well, for whatever period it was down in October
19 of 2007, is there anything that -- let me ask you this.

20 Is there anything that prevented you from applying
21 for the Principal of KGIA in August of 2007?

22 A. In August?

23 Q. Yes.

24 A. I didn't know if it was up or not.

25 Q. Is there anything that prevented you from applying

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1 for the position of Principal of KGIA in September of 2007?

2 A. In September, if the position had been up, but my
3 main -- I wanted to make sure that the school opened and,
4 therefore, I did not share with anybody how I was feeling of
5 whether I wanted to go back or not because I wanted to ensure
6 that the school opened.

7 Q. Did you have an understanding whether the position
8 was up, posted on the Department of Education website as of
9 September 2007?

10 A. I was not aware of it.

11 Q. But you knew earlier in the summer that it was
12 going to be posted?

13 A. Based on that e-mail that Rosemary Stewart had
14 sent.

15 Q. That e-mail was dated sometime in August of 2007?

16 A. Correct, it was that week of August 6th.

17 Q. So did you look at the Department of Education's
18 website in either August of 2007 or September of 2007 to
19 determine whether the position had been posted?

20 A. No, I did not.

21 Q. Why did you apply for the position of Principal at
22 KGIA?

23 A. Because I firmly believe that I am the person who
24 should be leading it as its founder.

25 Q. When did you -- is that something you have always

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1 felt or did you come to that decision around the time you
2 applied for the position?

3 A. I had always felt that way and I shared my wanting
4 to with Garth Harries in early October.

5 Q. Since August 10, 2007, do you know of any -- have
6 you become aware of any vacancies for positions of Principal
7 in the New York City Public School System other than KGIA for
8 which you would be eligible to apply?

9 A. They're on the website, but I did not go on the
10 website intentionally looking for those purposes.

11 Q. But you could go on the website to determine
12 whether there are Principal positions in the New York City
13 public schools for which you're eligible?

14 A. Yes, they are public for the public, open to the
15 public.

16 Q. Is there any reason why -- well, have you applied
17 for the position of Principal for any school other than KGIA?

18 A. No.

19 Q. Why is KGIA the -- why haven't you applied for the
20 position of Principal for any school other than KGIA?

21 A. Because I have -- there is -- I don't have an
22 interest in applying for any other. I feel committed to KGIA
23 for the fact that I have been the founding Principal, who
24 worked on the proposal, who worked on the development and
25 creation.

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1 Q. Do you believe you have the qualifications to serve
2 as the Principal for any school in the New York City Public
3 School systems for which you're eligible to apply other than
4 KGIA?

5 A. Yes.

6 Q. Did you receive a response to your application for
7 the position of Principal at KGIA?

8 A. After submitting the application?

9 Q. After submitting your application.

10 A. Yes. Yes, I received an e-mail saying that my
11 application was received. Then a couple days later I
12 received another e-mail stating that I did not have a middle
13 school license or certificate, I don't remember what the term
14 was, and that I needed to get one, and the deadline was
15 October 23rd.

16 And, therefore, I went on the DOE website and put
17 in for the middle school certificate or license. And then I
18 received word within, I think, a day or two that it was --
19 that I had received the license or certificate.

20 Q. After you received word that you received the
21 license or certificate, did you receive any word from the DOE
22 about your application for the position of Principal at KGIA?

23 A. I received an e-mail on Friday, I don't remember
24 that Friday.

25 MR. LEVINE: Friday before the lawsuit was

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1 filed?

2 THE WITNESS: Yes. It was an e-mail saying that
3 I was rejected.

4 Q. The first step in the selection process is the
5 what's called the Level I interviews?

6 A. Yes.

7 Q. And so you were not selected for the Level I
8 interviews?

9 A. Yes.

10 Q. Do you claim in this case that the reason you were
11 not selected for the Level I interviews was because of the
12 statements that are in the -- do you claim in this case that
13 the reason you were not selected for the Level I interviews
14 for the Principal position at KGIA was because of your
15 statements that appeared in *The Post* article on August 6,
16 2007?

17 A. I was not selected because the Chancellor was on
18 public record on October 18th saying that I was not be
19 considered. And it was for the very reasons that were
20 discussed by Bob Hughes and Deputy Mayor Dennis Walcott and
21 his meetings and the meetings with him.

22 Q. And these reasons rose in part, for lack of a
23 better word, the publicity that came after the August 6, 2007
24 *Post* article?

25 MR. LEVINE: Can I hear that question again?

D. ALMONTASER

1 BY MR. MARKS:

2 Q. The reasons that -- you had mentioned that Dennis
3 Walcott and Mr. Hughes had said that's why they asked you to
4 resign was because of negative media publicity about the
5 statements you made to -- that were attributed to you in the
6 August 6, 2007 *Post* article?

7 MR. LEVINE: Well, you're asking her why
8 Dennis Walcott asked her to resign or what her
9 allegation is in the Complaint? I'm a bit confused
10 and I think it's...

11 MR. MARKS: Well, all right. She's -- I'm
12 trying to find out -- Ms. Almontaser claims is the
13 reason she believes she was not selected for the
14 Level I interviews for the Principal position at
15 KGIA.

16 MR. LEVINE: Well, it's a 70-something,
17 80-something paragraph Complaint that explains why
18 and we've been going on four or five hours about
19 why she thinks she wasn't accepted. It's a hard
20 question to summarize in response to one word.

21 MR. MARKS: As I understand it, one of the
22 main claims in this First Amendment case is that
23 it's retaliation for the alleged exercise of her
24 right to free speech?

25 MR. LEVINE: Absolutely.

D. ALMONTASER

1 BY MR. MARKS:

2 Q. Do you claim that you were not selected for the
3 Level I interviews for the Principal of KGIA because of
4 exercising your right to free speech under the First
5 Amendment?

6 A. Yes.

7 Q. What is the speech that you claim caused you not to
8 be selected for the Level I interviews for the Principal
9 position of KGIA?

10 A. What was based in *The New York Post* article.

11 Q. So your statements in *The New York Post* article on
12 August 6, 2007?

13 A. Yes.

14 MR. MARKS: Let's take a two-minute break.

15 (Whereupon, a short recess was taken.)

16 (Time noted: 3:28 p.m.)

17 MR. MARKS: Back on the record.

18 (Time noted: 3:38 p.m.)

19 BY MR. MARKS:

20 Q. Do you claim in this action that you were forced to
21 resign as Principal of KGIA in retaliation for your exercise
22 of your First Amendment right of free speech?

23 A. Yes.

24 Q. Is the speech you claim you were forced to resign
25 in retaliation for was your statements in *The New York Post*

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1 article on August 6th, that were published on August 6th of
2 2007?

3 A. I'm sorry, I missed the first part of your
4 question.

5 Q. Were the speech you claim that you or that caused
6 you -- strike that.

7 Was the speech you claim you engaged in for which
8 you were forced to resign were your statements that were
9 quoted in *The New York Post* in the article on August 6, 2007?

10 A. Yes.

11 MR. LEVINE: Let me note my objection because
12 I think you're really asking for a legal
13 conclusion. There are lots of allegations upon
14 which -- I mean, you look at the retaliation claim
15 what it says in the first paragraph under the
16 retaliation claim is for all the foregoing
17 paragraphs are repeated and realleged, so any
18 paragraphs that describe other speech or other
19 things that occurred during the week of August 6th
20 to 10th are incorporated in that retaliation
21 claim.

22 Having said that, you're entitled to your
23 questioning.

24 MR. MARKS: Except that the only claim that it
25 would be a -- it's only her speech that's at issue.

D. ALMONTASER

1 MR. LEVINE: Well, I mean, I'm happy to
2 pretend a judge was here.

3 BY MR. MARKS:

4 Q. At the location KGIA is at, there are also two
5 other schools; is that right?

6 A. Yes.

7 MR. MARKS: I have no further questions.

8 Obviously, as I said at the beginning of the
9 deposition, if this action proceeds further and
10 discovery proceeds further, we intend to, I guess,
11 either have an additional deposition or resume this
12 deposition to cover matters such as damages that
13 are not necessary to address in the context of the
14 expedited discovery and the preliminary injunction
15 motion.

16 MR. LEVINE: I just have one question.

17 EXAMINATION BY

18 MR. LEVINE:

19 Q. Ms. Almontaser, you'll recall that you were asked
20 by Mr. Marks some questions concerning your administrative
21 experience in the New York City Public School System.

22 Didn't you have some additional administrative
23 experience other than what you testified to growing out of
24 your studies at Baruch College?

25 A. Yes, I did.

D. ALMONTASER

1 Q. Please describe that experience?

2 A. Upon my coursework at Baruch College, we were
3 required to do an internship where we had to serve in a
4 school and accumulate, I think 300 hours, I can't remember
5 the exact number, but basically in all fields of
6 administration in a school setting. And I did that in P.S.
7 94 while I was a Literacy Staff Developer, where I was to
8 keep a binder showing the number of hours in all of the
9 different areas evidenced, stating that I did the internship
10 in an administrative capacity.

11 MR. LEVINE: No further questions.

12 MR. MARKS: I have one.

13 FURTHER EXAMINATION BY

14 MR. MARKS:

15 Q. Did you describe this administrative experience you
16 say you had when you were at Baruch College, in the
17 application you submitted for the position of Principal at
18 KGIA?

19 A. There was no question asking that, for internships
20 or...

21 Q. Would you consider an internship to be part of your
22 education?

23 A. It was a part of my education at Baruch and I had
24 to accumulate a few hundred hours showing that and it was at
25 P.S. 94.

D. ALMONTASER

1 Q. So are you saying there was no place in the online
2 application form for the position of Principal of KGIA for
3 you to list any of the administrative experience that you had
4 when you were at Baruch College?

5 A. To my knowledge of the application online, there
6 wasn't anyplace to include that.

7 Q. Does the application in anyplace ask you to include
8 relevant information on your experience, skills and vision
9 for student achievement?

10 A. Yes, it did in one of the essays.

11 Q. Could you have put in your prior administrative
12 experience at Baruch College in that essay?

13 A. I probably could have. It didn't dawn on me to do
14 so, although in my essay, I did outline the literacy, the
15 reading and writing initiative that I worked on at P.S. 94.

16 Q. Did you, in the online application for the position
17 of Principal at KGIA, describe the administrative experience
18 that you had at P.S. 295 in 2000 and in P.S. 94 in the summer
19 of 2000 and P.S. 94 in the summer of 1999?

20 A. No, I did not.

21 Q. Did you, in the online application for the
22 Principal of KGIA, describe the administrative experience you
23 say you acquired during your internship at Thurgood Marshall
24 Academy, Leadership Academy?

25 A. No, I did not include it in there. Again, I didn't

D. ALMONTASER

1 -- there wasn't anywhere there that said you should.

2 Q. Do you consider --

3 A. Or requesting it.

4 Q. Do you consider -- you could have put that in and
5 described your experience in your essay; is that right?

6 A. I don't know if it -- the essay's gave you specific
7 questions that you had to answer.

8 Q. When did you retain your attorneys, approximately?

9 MR. LEVINE: You mean when did she meet her
10 attorneys or...

11 BY MR. MARKS:

12 Q. When did you first meet with Mr. Levine or
13 Ms. Rollings?

14 A. Sometime in September.

15 (Continued on next page to include jurat.)

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D. ALMONTASER

1 MR. LEVINE: I'll get that information for you
2 if you want, but sometime in September is correct.

3 MR. MARKS: Okay.

4 I have nothing else.

5

6 (Whereupon, at 3:47 p.m., the Examination of
7 this Witness was concluded.)

8

9

10

DEBBIE ALMONTASER

11

12 Subscribed and sworn to before me
13 this ____ day of _____, 2007.

14

NOTARY PUBLIC

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4 EXHIBIT EXHIBIT

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D. ALMONTASER

C E R T I F I C A T E

STATE OF NEW YORK)
COUNTY OF NEW YORK) SS.:

I, SHAWN McCLINE, a Notary Public for and within
the State of New York, do hereby certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and that such
examination is a true record of the testimony given by that
witness.

I further certify that I am not related to any
of the parties to this action by blood or by marriage and
that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand
this 27th day of November, 2007.



SHAWN McCLINE
Registration #01MC6000688
Commission Expires 8/24/10

ERRATA SHEET

[illegible]

Look-See Concordance Report

UNIQUE WORDS: 1,720
TOTAL OCCURRENCES: 7,071
NOISE WORDS: 384
TOTAL WORDS IN FILE: 20,386

SINGLE FILE CONCORDANCE

CASE SENSITIVE

INCLUDES ALL TEXT
OCCURRENCES

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1 of 1 DOCUMENT

The New York Times

February 13, 2007 Tuesday
Late Edition - Final

A New School Plans to Teach Half of Classes Using Arabic

BYLINE: By ELISSA GOOTMAN**SECTION:** Section B; Column 1; Metropolitan Desk; Pg. 6**LENGTH:** 433 words

The New York City school system will open its first public school dedicated to teaching the Arabic language and culture in September, with half of its classes eventually taught in Arabic, officials said yesterday.

The school, the Khalil Gibran International Academy, is one of 40 new schools that the Department of Education is opening for the 2007-8 school year. It will serve grades 6 to 12 and will be in Brooklyn, although a specific location has not been determined.

Debbie Almontaser, a 15-year veteran of the school system who is the driving force behind the school and will be its principal, said that ideally, the school would serve an equal mix of students with backgrounds in Arabic language and culture and those without such backgrounds.

"We are wholeheartedly looking to attract as many diverse students as possible, because we really want to give them the opportunity to expand their horizons and be global citizens," said Ms. Almontaser, who emigrated from Yemen when she was 3 and is fluent in Arabic.

"I see students who are excited about engaging in international careers, international affairs, wanting to come to our school. And I also see Arab-American students who would want the opportunity to learn Arabic, to read it and write it and have a better understanding of where their ancestors have come from."

Next year, Ms. Almontaser said, the school, which is named after a Lebanese poet and philosopher, will have only sixth graders. It will grow year by year, and will eventually serve 500 to 600 students; by the third year, she said, she hoped that half of the school's classes would be taught in Arabic and half in English.

The school is opening in partnership with New Visions for Public Schools, a nonprofit group that has helped create dozens of small new schools in recent years, and the Arab-American Family Support Center, a Brooklyn social service agency that will provide the Arabic language instruction next year, as well as other programs. It will benefit from donations from the Bill and Melinda Gates Foundation, which has helped Mayor Michael R. Bloomberg create many other small schools.

Half of the 40 new schools the department will open in September were announced last month and the others were announced yesterday. The schools include 10 middle schools, 3 elementary schools, a kindergarten-through-eighth-grade school, 12 schools for grades 6 to 12, nine high schools and five transfer schools for students who struggled elsewhere.

A New School Plans to Teach Half of Classes Using Arabic The New York Times February 13, 2007 Tuesday Page 2

Many of the schools will be located in buildings of schools that are being closed for poor performance.

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1 of 2 DOCUMENTS

The Associated Press

April 16, 2007 Monday 8:51 AM GMT

Proposal for public school focusing on Middle Eastern culture in New York City draws protests

BYLINE: By NAHAL TOOSI, Associated Press Writer

SECTION: DOMESTIC NEWS

LENGTH: 724 words

DATELINE: NEW YORK

This city has dozens of small public schools that focus on themes sports careers, the arts and social justice. Few generate controversy.

Then, someone decided to start a Middle Eastern-themed school.

"Jihadi," "public madrassa," and "segregationist" are some of the labels tossed at the plan. Conservative Web sites have ranted against the idea, as have some members of the public. Even concerns about finding space for the school have been coupled with questions about security.

All this before the school has enrolled a single student.

"It's hard not to believe that this is in some way a political statement," said one opponent, 72-year-old Lorna Salzman. "I think it can very easily deteriorate into something that people could see as confrontational."

Debbie Almontaser expected the reaction. The New York City teacher, a Muslim of Yemeni background, will lead the Khalil Gibran International Academy, which is expected to open in the fall. She has done extensive interfaith and cultural work to fight stereotypes about Arabs and Muslims since Sept. 11.

If anything, she says, the school is needed more than ever.

"It is a school that is going to be working quite hard in building bridges of understanding, tolerance and acceptance, valuing diversity and truly just developing students into global citizens," she said.

The school, which is named after the famed Lebanese-American Christian poet who promoted peace, would be one of a few nationwide that incorporate the Arabic language and Islamic culture. Almontaser and city Department of Education officials say the curriculum will be in line with basics required from public schools while integrating elements of its theme.

For instance, the role of Arabs in developing algebra would be explored in math. In history, students may study Egypt's extraordinary past. And Arabic will be offered as a second language. The goal is to eventually teach half of the classes in Arabic.

Proposal for public school focusing on Middle Eastern culture in New York City draws protests The Associated Press
April 16, 2007 Monday 8:51 AM GMT

Plans are to open this September with a 6th grade and gradually expand into a middle school and high school. About half the students are expected to be of Arab heritage, though the school will have open admission.

New York already has schools specializing in Asian culture and Chinese language, and is opening one that centers on Latin American culture. When the education department revealed plans for the Middle Eastern school earlier this year, the reaction was fierce on right-wing Web sites.

Daniel Pipes, a conservative commentator who frequently rails against militant Islam, wrote on his blog: "In principle it is a great idea the United States needs more Arabic-speakers. In practice, however, Arabic instruction is heavy with Islamist and Arabist overtones and demands."

Critics questions whether the school can separate religion from Arab culture and language in its teaching.

"Being that we are a public school, we certainly are not going to be teaching religion," said Almontaser, 39. "Islam does not have a culture. Islam is a religion."

She said the school won't shy away from sensitive topics such as colonialism and the Israeli-Palestinian crisis.

"Teachers are going to be expected to provide students with multiple perspectives on whatever the issue is," Almontaser said. "Students will, through the critical-thinking skills that they will develop, make informed decisions on the perspective that they want to believe."

Almontaser said she has heard interest from parents of all backgrounds, and stresses that a multi-ethnic, multi-religious group of people played a role in the devising the school. She expects to easily fill 81 slots this year if the academy finds a place to teach the students.

The education department has proposed that the school share the Public School 282 building in Brooklyn's Park Slope neighborhood for the first three years. Parents of students at PS 282, an elementary school, say squeezing another school inside the building would hurt resources available to their children.

Some have noted that the school has generated ideological controversy, and have questioned if that could mean a security risk. And some say they don't want older students sharing a building with their young children.

Almontaser said she hopes the space issue will be resolved to everyone's satisfaction. And she has a suggestion for those who persist in questioning her school's existence: "Come visit us."

LOAD-DATE: April 17, 2007

LANGUAGE: ENGLISH

PUBLICATION-TYPE: Newswire



1 of 1 DOCUMENT

The New York Times

May 4, 2007 Friday

Late Edition - Final

Plan to Open an Arabic School In Brooklyn Arouses Protests

BYLINE: By JULIE BOSMAN

SECTION: Section B; Column 4; Metropolitan Desk; Pg. 1

LENGTH: 1237 words

The Khalil Gibran International Academy was conceived as a public embrace of New York City's growing Arab population and of internationalism, the first public school dedicated to the study of the Arabic language and culture and open to students of all racial and ethnic backgrounds.

But nearly three months after plans for the middle school were first announced, a beleaguered Department of Education is fending off attacks from two angry camps: parents from Public School 282, the elementary school in Park Slope, Brooklyn, that was assigned to share building space with the Khalil Gibran school, and a handful of columnists who have called the proposed academy a madrassa, which teaches the Koran.

Now the chancellor of schools, Joel I. Klein, is considering other locations for the school, or even postponing the opening for a year, according to several people involved in the discussions, and the whole endeavor has been turned into a test of tolerance -- and its limits -- in post-9/11, multiethnic New York.

The principal, Debbie Almontaser, who came to America from Yemen at age 3 and who organized peace rallies and urged tolerance after the attacks of Sept. 11, 2001, has been vilified on Web sites as having an "Islamist agenda."

Ms. Almontaser said she was prepared for the reaction. "Quite frankly, I don't let it bother me," she said. "I don't lose sleep over it. My main objective is the opening of the school."

Friends of the teacher, who is known as a moderate active in interfaith groups, call the accusation preposterous.

"It's tragic that they should be targeting her," said the Rev. Dr. Daniel Meeter, pastor of Old First Reformed Church in Park Slope.

Some call the controversy over the school heartbreaking. "Now is the critical time to teach young people Arabic," said Eileen F. Reilly, a director at Camba, a Brooklyn social services agency, and a friend of Ms. Almontaser's. "If a school like this can't happen in Brooklyn, where can it happen?"

Others say that there is no room for such a school in New York. Alicia Colon, a columnist for The New York Sun, wrote that Osama bin Laden must have been "delighted" to hear the news of the school. "New York City, the site of the worst terrorist attack in our history, is bowing down in homage to accommodate and perhaps groom future radicals," she said. "I say break out the torches and surround City Hall to stop this monstrosity."

Khalil Gibran, named after the noted Lebanese-born poet and philosopher who wrote "The Prophet," is a

Plan to Open an Arabic School In Brooklyn Arouses Protests The New York Times May 4, 2007 Friday

partnership with New Visions for Public Schools, a nonprofit agency that has helped open dozens of schools, and the Arab-American Family Support Center, a social service agency in Brooklyn.

Plans for the school called for it to enroll 81 students for the 2007-8 school year, beginning with sixth graders only, and eventually expanding to Grades 6 through 12.

It was envisioned like other dual-language schools in the city, like the Shuang Wen Academy, a top-performing elementary school on the Lower East Side that teaches classes both in English and in Mandarin.

The first sign of discontent came from the parents of P.S. 282, where the school was supposed to share space. They staged protests and besieged Mr. Klein's office with e-mail messages this winter and spring.

Their litany of complaints was long: They objected to sharing space with another school, particularly with middle and high school students who they said could put their elementary school children in danger. They predicted that class sizes at P.S. 282, now comfortably small, would increase close to capacity. And they were indignant when told that they would have to sacrifice space they used for activities like computer instruction and chess.

"We all just want 282 to remain an elementary school with the same space and services that we have now," said Xiomara Fraser, the PTA president. "Their interest is getting a whole new school that has nothing to do with this school and that will encroach on our space and disrupt the flow of this school."

As the efforts by the parents of P.S. 282 stalled, another form of protest was just getting started. Ms. Almontaser had become a high-profile figure in Brooklyn after 9/11 and had spoken in interviews about her embrace of Muslim customs, including wearing a hijab, and how she was a part of the American melting pot.

A Web site called Militant Islam Monitor recently posted side-by-side photographs of Ms. Almontaser wearing different types of headscarves, suggesting that she had changed her appearance to disguise her "Islamist agenda."

In The New York Sun, a column by Daniel Pipes, the director of the Middle East Forum, a conservative research center that says its goal is to promote American interests in the region, declared that "A Madrassa Grows in Brooklyn," contending that the school would generate problems and promote an "Islamic outlook."

Mr. Pipes, who lives in Philadelphia, said in a telephone interview, "What you find is that the materials that are included in an Arabic curriculum have a natural tendency to promote Islam."

A Department of Education spokeswoman said the school would have a standard college preparatory curriculum, with separate Arabic language instruction.

Ms. Almontaser said she planned a curriculum that was not religion-based, and that would include the history and contributions of the Arab people.

Supporters of the school, many of them residents of heavily Muslim communities in Brooklyn, have come out in large numbers to defend Ms. Almontaser.

"It's just outrageous," said Mohammad Razvi, the executive director of the Council of Peoples Organization. "It is not fair for anyone to make such negative remarks just because the school is going to be teaching Arabic as a language. She's a person who brings communities together and makes them understand and works on peace."

Mr. Razvi said he intends to send his 11-year-old son, Akeel, to Khalil Gibran if it opens this fall.

"People are very much excited, very much encouraged by the school," said Shamsi Ali, an imam at the Islamic Center on East 96th Street in Manhattan and a member of the advisory board of Khalil Gibran. "After Sept. 11, particularly, Arab communities felt misunderstood. Such a school, I think, will show our good intentions."

Plan to Open an Arabic School In Brooklyn Arouses Protests The New York Times May 4, 2007 Friday

If the school is postponed, it may be because of logistics as much as controversy. Since a location has not been confirmed yet, the Education Department has not been able to accept applications formally. At this point in the year, most fifth graders already know where they will be attending sixth grade in the fall.

"The location right now is being worked on by the Department of Education, and I'm confident that they are working to find us a home that will be embracing and positive," Ms. Almontaser said.

Meanwhile, the parents of P.S. 282 have labored to distance themselves from the school's other opponents. Linda Littlefield, a parent and PTA member, said the parents were "horrified" by the ideological opposition by columnists to an Arab language school. "We felt that was so damaging," she said, emphasizing that the Park Slope parents did not have a problem with the theme of the school, but did not want to share the school itself.

"We don't talk to them," Ms. Fraser added of the columnists. "They do what they have to do to sell their papers."

URL: <http://www.nytimes.com>

LOAD-DATE: May 4, 2007

LANGUAGE: ENGLISH

GRAPHIC: Photos: Debbie Almontaser, principal of the planned Khalil Gibran Academy. (Photo by Diane Bondareff/Associated Press)(pg. B1)

Mohammad Razvi, with his sons Zanal, left, and Akeel, said he was shocked by the negative reaction to plans for a school for Arabic studies. He said he intended to enroll Akeel in the school this fall. (Photo by Michael Nagle for The New York Times)(pg. B6)

PUBLICATION-TYPE: Newspaper

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NY1 News

Arabic Language School Struggles To Find A Home

May 04, 2007

For the city's first Arabic dual-language school, it's apparently not a question of whether it will open, but where. Education officials have scrapped plans to put it inside an existing Brooklyn school, but promise to find another location. NY1's Jeanine Ramirez filed the following report.

Late Friday, The Department of Education decided Public School 282 in Park Slope will not have to make room for the city's first Arabic language school.

"Siting the Khalil Gibran International Academy at the school would be detrimental to its core academic programs," said DOE spokesman David Cantor.

But plans to open the academy this September are still in the works, which is good news for Debbie Almontaser, who proposed the school last year.

"We felt that it was really important to advocate for Arabic as a second language because it's one of the most sought out languages in the entire world," said Almontaser. "And we wanted to provide New York City students a competitive edge, an opportunity to provide for international careers in diplomacy."

The plan for 6th through 12th graders was approved in January.

Education officials wanted the academy to be housed in Park Slope, but P.S. 282 parents said there's not enough room and their young children should not have to share the school with older students. And the criticism didn't stop there. The academy, which is named after a renowned Lebanese poet and author, as also spurred anti-Arab sentiment.

Almontaser has not only had to defend the school, but also herself. A website called Militant Islam Monitor claims she varies her headscarves trying to disguise an Islamic agenda.

"I have to say that I'm really flattered," said Almontaser. "I'm flattered that there's so much attention being paid to me, especially about how I dress."

Earlier this week, Schools Chancellor Joel Klein had to field questions about religion being part of the curriculum.

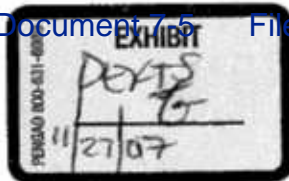
"If any school became a religious school, as some people say Khalil Gibran would be, or it became a national school, in the sense that it really wasn't an American public school, I would shut it down," said Klein. "I promise you that."

While religion is not part of the dual-language school, Almontaser says Arab culture, history, and contributions are.

"With any language that you learn you need to learn about the people and their customs and their history to develop effectively in that language, in order not to offend people when speaking the language," she said.

Meanwhile, the Department of Education says it's currently looking for another site to open the Khalil Gibran International Academy.

-Jeanine Ramirez



1 of 1 DOCUMENT

The New York Post

May 5, 2007 Saturday

CITY ARAB SCHOOL MOVE DEFEATED

BYLINE: DAVID ANDREATTA Education Reporter

SECTION: Sports+Late City Final; Pg. 2

LENGTH: 228 words

Responding to an outcry from parents, the city yesterday dropped plans to have a Brooklyn elementary school share its building with a new Arabic-language secondary school.

Education officials insisted the decision not to house the Khalil Gibran International Academy with PS 282 in Park Slope was logistical and unrelated to controversy surrounding the new school's concept, which some critics had attacked as a disguise for radical Islam.

The officials said the Department of Education was still committed to opening the school.

The proposal had sparked a flurry of heated protests in recent weeks from the PS 282 community, which argued the academy would enlarge class sizes and force the closure of art rooms and science and computer labs.

David Cantor, press secretary to Schools Chancellor Joel Klein, said it was determined that Khalil Gibran "would be detrimental to [PS 282's] core academic programs."

News of the decision was greeted with a sigh of relief from parent leaders.

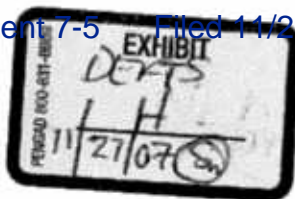
"The needs of a middle school are completely different from the needs of an elementary school, and we were going to have to give up a lot," said Xiomara Fraser, co-president of the PTA. "It was about literally losing our school."

The principal of Khalil Gibran, Debbie Almontaser, said the parents' concerns were "valid" and that she was not disappointed with the outcome.

LOAD-DATE: May 7, 2007

LANGUAGE: ENGLISH

PUBLICATION-TYPE: Newspaper



May 19, 2007 / News / Perspective

Exclusive: Almontaser speaks! Gibran school principal stares down her critics

By Dana Rubinstein
The Brooklyn Paper



The Brooklyn Paper / Dana Rubinstein

First Park Slope parents, and then their Boerum Hill counterparts, have been engaging in a seemingly epic — and nasty — scuffle about the placement of an Arabic language and culture academy into an existing school building.

But amid all this shouting, one voice was largely absent: that of Khalil Gibran International Academy Principal Debbie Almontaser (pictured).

Almontaser is a native of Yemen and a longtime veteran of the Brooklyn public school system, having worked for years as an elementary school teacher and diversity consultant.

This week, Almontaser spoke with The Brooklyn Paper about her school, her vision, and the ensuing brouhaha.

Q: This week, you attended a Boerum Hill PTA's "emergency" meeting about the city's latest plan to house your school within the existing High School for the Arts on Dean Street. How did you feel about the parents' concerns?

A: These are issues and concerns that parents have a right to raise. I feel for them. I know how they feel in terms of being in this situation. I'm also in this predicament, in

that my school is going to be placed in a building that already has two other schools, and I won't have the luxury of space that ideally I would like to have or had envisioned when proposing this school to [the city]. But the school is approved, and we're determined to open it, and we're determined to work collaboratively with the other principals to make it work.

Q: At the meeting, you said that you had no role in deciding the school's location, except for your preference for Brooklyn. That said, did you expect the process of placing the school to be so difficult?

A: I did. This is just the nature of New York City and the lack of space for many things. ... The Academy is quite an intriguing school for many people, and I'm not surprised by some of the questions that were raised ... because ... you have people who are not very well informed about the public school system, [who don't] understand [that the schools] are not religion-based. I'm glad [questions were] raised. I've answered them. Deputy Mayor [Dennis] Walcott answered them. This is a public school providing a non-religious education for students who are interested in learning Arabic as a second language.

Q: What will the school's curriculum be like?

A: All of the [city's] core curriculum expectations [will be met]. Sixth graders will learn about the ancient world ... We will have reading and writing, math, science. What will be different [is that] we will be able to infuse historical information into math and science and literature. ... With any foreign language you engage in, you need to learn the history, culture and customs of the people in order to navigate the language effectively and not offend anyone.

Q: Could you give us an example of how Arabic history and culture will infuse the core curriculum?

A: In math, as you know, algebra originated from the Arab world. So, we'll look at the historic background of algebra, at the historic background of the Arabic numbers. The numbers we use today are Arabic numerals.

Q: How much of the instruction will be in Arabic?

A: The language aspect of it will take place during our extended day, from 3 to 5 pm ... Students are expected to pass the Arabic Regents in order to graduate, so we're very serious about them developing this language.

Q: Why is it important for public-school students to have the option of learning Arabic?

A: At this time and age, it's so important for students in the United States to have one or two languages under their belt. Right now, Arabic is one of the most sought-after

languages in the entire world. There are millions of dollars in federal funding that are available to education systems to teach Arabic. I saw this as a very important opportunity ... to provide [students] a competitive edge for the 21st century, [so] they can develop into globally oriented citizens, [so they can] learn about the world from many different lenses.

Q: What do you say to conservative critics like Daniel Pipes, who called Arabic language instruction "inevitably laden with pan-Arabist and Islamist baggage?"

A: He studied the Arabic language as a Middle Eastern historian and he seems to have done really well at still maintaining his roots and his identity. And I'm confident that we will be able to teach students Arabic as a second language and make sure they maintain their identity as he has.

Q: Do you expect to fill all 60 seats in your first class of sixth graders at Khalil Gibran, giving how late in the year it is?

A: Absolutely, without a doubt. We had a Brooklyn middle school fair, and we had over 60 families [expressing interest].

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Arabic public school will unite, not divide, us

BY DEBBIE ALMONTASER

Posted Sunday, May 20th 2007, 4:00 AM



Be Our Guest

Even though the Khalil Gibran International Academy -for which I will serve as the founding principal - won't open its doors for another three months, the school has already attracted national and even international attention.

Some critics claim that we will be segregating students based on their cultural identity - which they argue is contrary to the mission of public schools. Others have gone so far as to call our school "Khalil Gibran Islamist Academy" and "a taxpayer-funded madrasah."

I can't say I'm surprised at the reaction. But the claims are unfounded and unfair. Gibran Academy aims to offer all its students, from sixth through 12th grade, a rigorous, well-rounded and completely secular education that broadens their horizons. It is the type of school that can strengthen and unify the city - not, as some allege, tear it apart.

In 2005, when I first discussed creating an Arabic dual-language public school in New York City, controversy was far from my mind. I was thrilled then - and still am thrilled - by a vision of offering a Regents-based curriculum enhanced by intensive instruction in Arabic and the study of Middle Eastern history and culture, to give students unique and powerful preparation for success in the 21st century.

Such a school would graduate students with the skills they need to become independent thinkers, able to work and collaborate with cultures beyond their own in our increasingly global world. They would be equipped for careers in international affairs, diplomacy and business, among others.

My background was suited to creating such a school. I am an Arab-American, born in Yemen and raised in the U.S. I have worked for the New York City public schools for more than 15 years as a special education teacher, literacy trainer, youth development specialist and coordinator of cultural diversity and community-based programs.

I have also been extensively involved in interfaith and community work, promoting tolerance and bridge-building alongside people from different backgrounds all across the city.

This work proved crucial to the creation of the academy. My plan was to open the school in Brooklyn in an effort to serve both the Arab-American community and the broader community. This is a critical point; the school is not designed for Arab-American children. Rather, it is for students of all backgrounds to learn about the world, with a special focus on Arabic language and culture.

In the spring of 2006, the Arab American Family Support Center joined me as the school's lead partner, bringing expertise in language instruction. And I recruited the Tanenbaum Center for Interreligious Understanding to help develop a curriculum in conflict resolution, a skill we consider essential for the internationally minded citizens the school would produce.

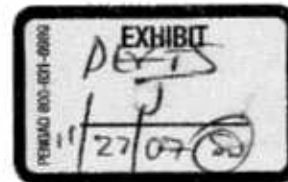
My belief that KGIA will be a jewel among the city's public schools is undimmed by the recent criticism. I welcome anyone to visit the school in the fall. You won't find religious or political indoctrination or anti-Americanism. What you will see is a diverse group of several dozen sixth-graders beginning an educational journey during which they will become fluent in Arabic. They will become versed in Arab history and culture, among others. They will master and surpass city and state standards in English, math, science and social studies.

Students will graduate emulating Khalil Gibran's quote, "The universe is my country and the human family is my tribe."

Almontaser is principal-designate of the Khalil Gibran International Academy.

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CITY PRINCIPAL IS 'REVOLTING' - TIED TO 'INTIFADA NYC' SHIRTS The New York Post August 6, 2007
Monday

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The New York Post

August 6, 2007 Monday

SECTION: All Editions; Pg. 7

LENGTH: 374 words

HEADLINE: CITY PRINCIPAL IS 'REVOLTING' - TIED TO 'INTIFADA NYC' SHIRTS

BYLINE: CHUCK BENNETT and JANA WINTER

BODY:

Activists with ties to the principal of the city's controversial new Arabic-themed school are hawking T-shirts that glorify Palestinian terror, The Post has learned.

The inflammatory tees boldly declare "Intifada NYC" - apparently a call for a Gaza-style uprising in the Big Apple.

The organization selling the shirts, Arab Women Active in Art and Media, shares office space on Brooklyn's Third Avenue with the Saba Association of American Yemenis.

Dhabah "Debbie" **Almontaser**, principal of the Khalil Gibran International Academy - which is scheduled to open in Brooklyn next month - is a board member and spokeswoman for Saba.

Members of AWAAM refused to comment.

But **Almontaser** downplayed the significance of the T-shirts.

"The word [intifada] basically means 'shaking off.' That is the root word if you look it up in Arabic," she said.

"I understand it is developing a negative connotation due to the uprising in the Palestinian-Israeli areas. I don't believe the intention is to have any of that kind of [violence] in New York City.

"I think it's pretty much an opportunity for girls to express that they are part of New York City society . . . and shaking off oppression."

AWAAM's co-founders, Rama Kased and Mona Eldahry, are also active in the more militant pro-Palestinian group, al-Awda, whose main U.S. office is in California.

That organization, according to the Anti-Defamation League, is an active supporter of the terrorist groups Hezbollah and Hamas.

"The T-shirt is a reflection of a movement that increasingly lauds violence against Israelis instead of

Almontaser, a community activist and Muslim, has said the new grade 6-12 public school will be modeled on other dual-language city schools and have no religious component.

But the shirt sales are giving new ammunition to critics who fear **Almontaser's** school will teach a biased view of Middle Eastern history.

"Intifada is a war. Isn't that what Arafat had?" said Pamela Hall, a Manhattan mom opposed to the academy on the grounds that it violates separation of church and state.

A Department of Education spokeswoman defended **Almontaser**, saying her link to the T-shirt was tenuous.

GRAPHIC: FUROR: The pro-violence shirt is being defended by Principal Debbie **Almontaser** (left). [William C. Lopez]

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